

Hearing Date: February 1, 2023 at 8:30 a.m. (ET) / 9:30 a.m. (AST)
Objection Deadline: December 5, 2022 at 3:00 p.m. (ET) / 4:00 p.m. (AST)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

Debtors.¹

/

**SUMMARY COVER SHEET FOR THE NINTH & FINAL FEE APPLICATION OF
GENOVESE JOBLOVE & BATTISTA, P.A., AS SPECIAL LITIGATION COUNSEL TO
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF
JANUARY 1, 2022 – JULY 31, 2022**

All Fees and Services included in this Final Application were performed outside of Puerto Rico

SUMMARY COVER SHEET

Name of applicant:	Genovese Joblove & Battista, P.A. (“ <u>GJB</u> ”)
Authorized to provide professional services to:	Special Litigation Counsel for the Official Committee of Unsecured Creditors (the “ <u>Committee</u> ”) ²

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

Name of Client:	Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA and PBA)
Petition Date:	May 3, 2017 ³
Date of retention:	May 31, 2019, effective as of April 16, 2019 [Docket No. 7181]
Period for which compensation and reimbursement are sought:	January 1, 2022 – July 31, 2022 (the “ <u>Application Period</u> ”)
Amount of final compensation sought as actual, reasonable, and necessary:	\$147,175.50 ⁴
Amount of interim expense reimbursement sought as actual, reasonable, and necessary:	\$11,922.93
Are your fee or expense totals different from the sum of previously-served monthly statements for the Application Period?	No.
Total compensation approved by interim order to date:	\$657,907.05 (First Interim Fee Order ECF No. 9046) \$1,339,434.84 (Second Interim Fee Order ECF No. 13296) \$1,171,906.40 (Third Interim Fee Order ECF No. 13824) \$887,215.20 (Fourth Interim Fee Order ECF No. 15971) \$499,302.23 (Fifth Interim Fee Order DE 17646) \$327,033.50 (Sixth Interim Fee Order DE 18371) \$163,364.88 (Seventh Interim Fee Order DE 20412) \$278,543.20 (Eighth Interim Fee Order DE 22727)

³ The Petition Date for the Commonwealth under Title III was May 3, 2017. The petition date for COFINA under Title III was May 5, 2017. The petition date for ERS and HTA under Title III was May 21, 2017. The Petition Date for PREPA under Title III was July 2, 2017.

⁴ The full amount of fees incurred by GJB during the Application Period total \$147,175.50. GJB agreed taking a voluntary fee reduction equal to 20% in the amount of \$29,435.10 and, thereby, seeks allowance and payment of fees in the amount of \$117,740.40. By the time of the hearing on this Application, a portion of this amount should have been paid by the Debtors pursuant to the Interim Compensation Order, and GJB reserves its rights to seek relief from the Court to the extent any outstanding fees and expenses that are due and payable are not paid on the terms set forth in the Interim Compensation Order.

Total expenses approved by interim order to date:	\$3,848.56 (First Interim Fee Order ECF No. 9046) \$43,602.27(Second Interim Fee Order ECF No. 13296) \$33,296.95 (Third Interim Fee Order ECF 13824) \$54,671.58 (Fourth Interim Fee Order ECF No. 15971) \$31,381.55 (Fifth Interim Fee Order DE 17646) \$37,092.49 (Sixth Interim Fee Order DE 18371) \$30,614.97 (Seventh Interim Fee Order DE 20412) \$19,344.38 (Eighth Interim Fee Order DE 22727)
Total allowed compensation paid to date:	\$5,324,707.30
Total allowed expenses paid to date:	\$253,852.75
Blended rate in this Application for all attorneys:	\$487.92/hour ⁵
Blended rate in this Application for all timekeepers:	\$430.59/hour
Total compensation sought in this Application already paid pursuant to a monthly compensation order but not yet allowed:	\$64,368.00
Total expenses sought in this Application already paid pursuant to a monthly compensation order but not yet allowed.	\$0.00
Total time expended for fee application preparation during the Application Period:	87.80hrs
Total compensation requested for fee application preparation during the Application Period:	\$37,934.00
Number of professionals included in this Application:	12
If applicable, number of professionals in this Application not included in a staffing plan approved by the client:	N/A

⁵ The calculation of the blended hourly rates reflected in this Application Period does not take into account GJB's agreement to reduce its fees by an amount equal to 20% of its hourly rates.

If applicable, difference between fees budgeted and compensation sought for the Application Period:	N/A
Number of professionals billing fewer than 15 hours to the case during the Application Period:	5
Are any timekeeper's hourly rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this Application using the rates originally disclosed in the retention application:	None.

SUMMARY OF PRIOR MONTHLY FEE STATEMENTS FOR THE COMPENSATION PERIOD JANUARY 1, 2022 THROUGH JULY 31, 2022

Date	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested	Fees Paid	Expenses Paid
June 30, 2022	January 1, 2022 – January 31, 2022	\$89,400.00	\$17,880.00	\$64,368.00	\$7,152.00	\$0.00	\$64,368.00	\$0.00

Summary of Amounts Requested to be Paid

Total Unpaid Fees: **\$53,372.40**

Total Unpaid Expenses: **\$11,922.93**

Total 10% Holdback on Fees: **\$32,752.08**

Reimbursement for 29% Tax Withholding: **N/A**

Reimbursement for 1.5% Government Contribution: **\$N/A**

Less expenses voluntarily reduced herein: **N/A**

Total Amount Requested to be Paid in Fees and Expenses for this period: \$65,295.33.

PRIOR INTERIM FEE APPLICATIONS

First Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
7/15/19	7994	April 19, 2019-May 31, 2019	\$691,742.25	\$553,393.80	\$498,054.42	\$55,339.38	\$10,373.05

Second Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
11/15/19	9213	June 1, 2019-September 30, 2019	\$1,728,948.00	\$1,383,158.40	\$1,244,842.56	\$138,315.84	\$43,602.27

Third Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
3/15/20	12409	October 1, 2019-January 31,2020	\$1,494,787.75	\$1,195,830.20	\$1,076,247.18	\$119,583.02	\$33,296.95

Fourth Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
11/16/20	15142	February 1,2020 -August 31,2020	\$1,124,542.00	\$899,633.60	\$809,670.24	\$89,963.36	\$56,687.18

Fifth Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
03/15/21	16068	September 1 2020 - January 31, 2021	\$499,302.23	\$399,441.78	\$359,497.62	\$39,944.16	\$31,381.55

Sixth Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holback (10%)	Expenses Requested
07/15/21	17365	February 1, 2021-April 30, 2021	\$327,033.50	\$261,626.80	\$235,464.12	\$26,162.68	\$37,092.49

Seventh Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holback (10%)	Expenses Requested
11/15/21	19219	June 1, 2021 – September 30, 2021	\$204,609.00	\$163,687.20	\$147,318.48	\$16,368.72	\$33,089.07

Eighth Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holback (10%)	Expenses Requested
08/31/22	21992	October 1, 2021 – December 31, 2021	\$349,725.50	\$279,780.40	\$251,802.36	\$25,180.24	\$19,344.38

SUPPORTING CERTIFICATION, EXHIBITS, AND SCHEDULES

In accordance with the U.S. Trustee Guidelines, at the end of this Application are the following Exhibits and Schedules:

- | | |
|-----------|--|
| EXHIBIT A | CERTIFICATION OF MARIAELENA GAYO-GUITIAN IN SUPPORT OF APPLICATION |
| EXHIBIT B | CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES |
| EXHIBIT C | SUMMARY OF TIMEKEEPERS INCLUDED IN THIS APPLICATION |
| EXHIBIT D | BUDGETS AND STAFFING PLANS FOR APPLICATION PERIOD |
| EXHIBIT E | SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY |

EXHIBIT E-1	SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY AS COMPARED TO BUDGET
EXHIBIT E-2	SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY
EXHIBIT F	BREAKDOWN OF COMPENSATION AND EXPENSE REIMBURSEMENT REQUESTED AND BY WHETHER SERVICES WERE RENDERED IN PUERTO RICO OR OUTSIDE PUERTO RICO
SCHEDULE 1	LIST OF PROFESSIONALS BY MATTER
SCHEDULE 2	MONTHLY STATEMENTS COVERED IN APPLICATION
SCHEDULE 3	PROPOSED ORDER

Hearing Date: February 1, 2023 at 8:30 a.m. (ET) / 9:30 a.m. (AST)
Objection Deadline: December 5, 2022 at 3:00 p.m. (ET) / 4:00 p.m. (AST)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

Debtors.⁶

/

**NINTH AND FINAL APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A.,
SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR PERIOD FROM
JANUARY 1, 2022 THROUGH JULY 31, 2022**

To The Honorable United States District Judge Laura Taylor Swain:

Genovese Joblove & Battista, P.A. (“GJB”), special litigation counsel to the Official Committee of Unsecured Creditors (the “Committee”), in the above-captioned Title III cases (the “Title III Cases”)⁷ hereby submits its Ninth & Final Fee Application (the “Application”) for allowance of compensation for professional services rendered, and reimbursement for actual and

⁶ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

⁷ The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

necessary expenses incurred in connection with such services, for the period from January 1, 2022 through July 31, 2022 (the “Application Period”).

On February 15, 2022, former GJB attorneys John Arrastia (“J. Arrastia”), Jesus Suarez (“J. Suarez”) and Angelo Castaldi (“A. Castaldi”) formed the law firm, Continental, PLLC (“Continental”) and took over representation of the Committee as special litigation counsel for the Committee. In connection with the foregoing, Arrastia, Suarez and Castaldi filed Notices of Appearance and Request for Notices and Papers [D.E. 20136]. On February 28, 2022, Continental filed their Informative Motion Regarding Change of Firm and Address, and Proposed Substitution of Counsel [Docket No. 20225]. As a result of the foregoing, GJB no longer is representing any party in these proceedings and thereby submits its Ninth and Final Fee Application. GJB submits this Application pursuant to sections 316 and 317 of the Puerto Rico Oversight, Management and Economic Stability Act of 2016 (“PROMESA”),⁸ section 503(b) of Title 11, United States Code (the “Bankruptcy Code”) as made applicable to these cases by section 301(a) of PROMESA, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the District of Puerto Rico (the “Local Rules”), *Appendix B of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* issued by the Executive Office for the United States Trustee, 28 CFR Part 58, Appendix B (the “Guidelines”), and in accordance with this Court’s the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Interim Compensation Order”) [Docket No. 1715]; the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Second Interim Compensation Order”) [Docket No. 3269]; the Fee Examiner’s November 10,

⁸ References to PROMESA are references to 48 U.S.C. §§ 2101 *et. seq.*

2017 Memorandum (the “Fee Examiner Memorandum”); the Court’s *Order on Fee Examiner’s Motion to Impose Presumptive Standards and Timeliness requirements for Professional Fee Applications* (the “Presumptive Order”) [Docket No. 3932]; the Court’s *Order Imposing Additional Presumptive Standards: Rate Increases and the Retention of Expert Witnesses or Other Sub-retained Professionals* (the “Revised Presumptive Order”) [Docket No. 7678] and the *Third Amended Order Setting Procedures for Interim and Final Compensation and Reimbursement of Expenses of Professionals* [Docket No. 20546] (“Third Interim Compensation Order”). In support of the Application, GJB submits the Certification of Mariaelena Gayo-Guitian (the “Gayo-Guitian Certification”), attached as **Exhibit A**, and respectfully represents as follows:

JURISDICTION AND VENUE

1. The Court has subject matter jurisdiction to consider and determine this Ninth and Final Application pursuant to PROMESA section 306(a). Venue is proper before this Court pursuant to PROMESA section 307(a). The statutory predicates for the relief requested herein are PROMESA sections 316 and 317, Bankruptcy Rule 2016 and Local Rule 2016-1.

2. This Application has been prepared in accordance with the Guidelines and the Third Interim Compensation Order. Attached as **Exhibit A** is a certification regarding compliance with the Local Guidelines.

3. This Application is consistent with the Third Interim Compensation Order (as defined below), Local Rule 2016-1, and *Appendix B of the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the “U.S. Trustee Guidelines”). To the extent necessary, GJB requests a waiver for cause shown of any requirements not met by this Application.⁹

⁹ The Committee and GJB reserve all rights as to the relevance and substantive legal effect of the U.S. Trustee

BACKGROUND

A. Case Background

4. On May 3, 2017, the Oversight Board commenced a Title III case for the Commonwealth of Puerto Rico by filing a voluntary petition for relief pursuant to section 304(a) of PROMESA (the “Commonwealth Title III Case”). Thereafter, the Oversight Board commenced a Title III case for each of COFINA, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (the “ERS Title III Case”), the Puerto Rico Highways and Transportation Authority (the “HTA Title III Case”), and the Puerto Rico Electric Power Authority (the “PREPA Title III Case”) (and together with the Commonwealth Title III Case, the “Title III Cases”).¹⁰ By orders dated June 29, 2017 [Docket No. 537] and October 6, 2017 [Docket No. 1417], the Court approved the joint administration of the Title III Cases.

5. On June 15, 2017, the Office of the United States Trustee for the District of Puerto Rico (the “U.S. Trustee”) filed a *Notice Appointing Creditors Committee for Unsecured Creditors* [Docket No. 338]. Thereafter, the U.S. Trustee modified the composition of the Committee membership [Docket Nos. 1171, 3058, and 3947], such that, currently, the members of the Committee are the American Federation of Teachers, Baxter Sales and Distribution Puerto Rico Corp., Doral Financial Corporation, Genesis Security Services, Inc., Service Employees International Union, Tradewinds Energy Barceloneta, LLC, and Unitech Engineering Group, S.E. (the “Committee Members”) [Docket No. 3947].

6. On August 25, 2017, the U.S. Trustee filed an *Amended Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 1171], which expanded the role of the Committee to be the official committee for the HTA Title III Case, the ERS Title III Case, and the

Guidelines with respect to any application for compensation in these cases.

¹⁰ Unless otherwise indicated, references to docket numbers shall be to the docket of the Commonwealth Title III Case.

PREPA Title III Case.

B. Retention of Genovese Joblove & Battista, P.A.

7. On April 16, 2019, the Committee selected GJB as proposed special litigation counsel to the Committee in connection with the evaluation and analysis of potential causes of action and representation as co-plaintiff in the filing and prosecution of certain claims and causes of action to be asserted against certain parties involved in the offering of (a) the Commonwealth's General Obligation bonds ("GO Bonds"), (b) bonds issued by the Public Buildings Authority ("PBA"), and (c) bonds issued by ERS ("ERS"), including bond counsel, disclosure counsel, underwriters, underwriters' counsel, swap counterparties, or auditors (collectively, the "Financial Party Targets").

8. The retention of GJB as special litigation counsel was necessary and appropriate because the Committee's primary counsel, Paul Hastings, LLP ("Paul Hastings") represents certain of the Financial Party Targets (or their affiliates) in matters unrelated to the Title III Cases.

9. On April 26, 2019, the Court approved the *Stipulation and Agreed Order By and Among Financial Oversight and Management Board, Its Special Claims Committee, and Official Committee of Unsecured Creditors to Joint Prosecution of Debtor Causes of Action* [Doc No. 6524] (the "Joint Prosecution Stipulation"). In connection with the prosecution of such claims or causes of action, the Oversight Board agreed to the appointment of the members of the Special Claims Committee of the Oversight Board ("Special Claims Committee"), on the one hand, and the Committee, on the other hand, as co-trustees and co-plaintiffs with respect to the Co-Plaintiff Adversary Proceedings.

10. As set forth in the Engagement Agreement dated April 30, 2019, GJB was retained by and authorized to represent the Committee as special litigation counsel and conflicts counsel in connection with, among other matters, the evaluation and analysis of potential causes of action

and representation as co-plaintiff in the filing and prosecution of certain claims and causes of action to be asserted against certain parties involved in the involved in the offering of (a) the Commonwealth's General Obligation bonds, (b) bond issued by the Public Buildings Authority, and (c) bonds issued by ERS, including underwriters, underwriters' counsel, swap counterparties, disclosure counsel, and auditors (collectively, the "Financial Party Targets").

11. On April 30, 2019, the Committee filed the *Application for Order Pursuant to Bankruptcy Code Section 1103(a) and Local Bankruptcy Rule 2014-1(e) Authorizing Employment and Retention of Genovese Joblove & Battista, P.A. as Special Litigation Counsel to Official Committee of Unsecured Creditors, Effective as of April 16, 2019* [Docket No. 6661] (the "GJB Employment Application").

12. On May 31, 2019, the Court entered the *Order Authorizing Employment and Retention of Genovese, Joblove & Battista, P.A. as Special Litigation Counsel to Official Committee of Unsecured Creditors, Pursuant to Bankruptcy Code Section 1103(A) and Local Rule 2014-1(e), Effective as of April 16, 2019* [Docket No. 7181] (the "Retention Order").

13. GJB's retention extends to the representation of the Committee as the official committee for the HTA Title III Case, the ERS Title III Case, and the PREPA Title III Case. In particular, the Retention Order provided that "[t]he retention of GJB, as counsel to the Committee, shall be deemed to apply to the representation of the Committee if ever enlarged to include unsecured creditors of other debtors, without the need to obtain a modification of this Order."

14. The Retention Order authorized GJB to be compensated on an hourly basis and reimbursed for actual and necessary out-of-pocket expenses pursuant to sections 316 and 317 of PROMESA, the Bankruptcy Rules, the Local Rules, and such orders as the Court may direct. The Retention Order further provides that "[p]ursuant to Bankruptcy Code section 503(b)(1), made applicable by PROMESA section 301(a), the fees and expenses of GJB shall be an administrative

expense.” In addition, as provided in the Retention Order, the Committee has consented to the Debtors’ payment of GJB’s allowed fees and expenses.

C. Interim Compensation and Fee Examiner Orders

15. On August 23, 2017, the Court entered the *Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Interim Compensation Order”) [Docket No. 1150].

16. On October 6, 2017, the Court appointed a Fee Examiner in these Title III Cases (the “Fee Examiner”) pursuant to the *Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(a) Appointing a Fee Examiner and Related Relief* [Docket No. 1416] (the “Fee Examiner Order”). The Court appointed Brady Williamson as the Fee Examiner in the Title III Cases.

17. On October 31, 2017, the Fee Examiner filed the *Urgent Motion of the Fee Examiner to Amend the Interim Compensation Order, Including the Due Date and Hearing Date for Interim Compensation* [Docket No. 1594].

18. On November 8, 2017, the Court entered the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1715].

19. On November 10, 2017, the Fee Examiner issued a memorandum, and on January 3, 2018, the Fee Examiner issued a supplemental memorandum (together, the “Fee Examiner Guidelines”) to all retained professionals in these Title III Cases providing additional guidelines in connection with the Interim Compensation Order.

20. On May 8, 2018, the Fee Examiner filed the *Motion of the Fee Examiner to Amend the Fee Examiner Order with Respect to the Scope of the Fee Examiner’s Authority in the Interest of Administrative Efficiency* [Docket No. 3032] (the “Motion to Amend the Fee Examiner Order”).

21. On May 23, 2018, the Oversight Board and the Puerto Rico Fiscal Agency and Financial Authority (“AAFAF”) filed a *Joint Motion for Entry of an Order Further Amending the Interim Compensation Order* [Docket No. 3133].

22. On June 6, 2018, the Court entered the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Second Interim Compensation Order”) [Docket No. 3269].

23. On June 20, 2018, the Court entered the *First Amended Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(A) Appointing a Fee Examiner and Related Relief* [Docket No. 3324] (the “Amended Fee Examiner Order”).

24. On June 26, 2019, the Court entered the *Order Imposing Additional Standards: Rate Increases and the Retention of Expert Witnesses or Other Sub-Retained Professionals* [Docket No. 7678].

25. On April 12, 2022, the Court entered the *Third Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Third Interim Compensation Order”) [Doc. No. 20546], and in accordance therewith, GJB and other professionals retained in these Title III Cases were authorized to serve upon the parties identified therein (the “Notice Parties”) monthly fee statements (the “Monthly Fee Statements”).

26. Pursuant to the Third Amended Interim Compensation Order, the Notice Parties have ten (10) days from the date of service of the Monthly Fee Statement to object to the amounts requested. If no objection is filed prior to expiration of the objection period, the Commonwealth is authorized to pay the respective professionals 90% of the fees and 100% of the expenses sought in each Monthly Fee Statement.

D. Applications for Interim Compensation

27. In addition to the Monthly Fee Statements, the Third Interim Compensation Order directed professionals to seek interim allowance and payment of compensation (including the 10% held back from Monthly Fee Statements) and expense reimbursement at 120-day intervals (each an “Interim Fee Period”) by filing with the Court and serving on the Notice Parties an application for approval and allowance of all compensation and reimbursement of expenses relating to services rendered and expenses incurred during the preceding Interim Fee Period (*see* Interim Compensation Order at ¶2(d)).

28. On July 15, 2019, GJB filed its First Interim Fee Application for the period from April 16, 2019 through May 31, 2019 [ECF No. 7994] (the “First Interim Fee Application”). The hearing on the First Interim Fee Application was held on October 30, 2019 at 9:30 a.m.

29. On October 29, 2019, the Court entered the *Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Sixth Compensation Period from February 1, 2019 through May 31, 2019* [ECF No. 9046] (the “First Interim Fee Order”). Pursuant to the First Interim Fee Order, GJB was awarded \$657,907.05 in fees and reimbursement of expenses in the amount of \$3,848.56.

30. On November 15, 2019, GJB filed its Second Interim Fee Application for the period from June 1, 2019 through September 30, 2019 [ECF No. 9213] (the “Second Interim Fee Application”). The hearing on the Second Interim Fee Application was held on March 4, 2020 at 9:30 a.m. and was continued to April 22, 2020 at 9:30 a.m.

31. On June 1, 2020, the Court entered the *Second Supplemental Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Seventh Interim (June 1- September 30, 2019) and Prior Compensation Periods* [ECF No. 13296] (the “Second Interim Fee Order”). Pursuant to the

Second Interim Fee Order, GJB was awarded \$1,339,434.84 in fees and reimbursement of expenses in the amount of \$43,602.27.

32. On March 16, 2020, GJB filed its Third Interim Fee Application for the period from October 1, 2019 through January 31, 2020 [ECF No. 12409] (the “Third Interim Fee Application”). The hearing on the Third Interim Fee Application was held on July 29, 2020 at 9:30 a.m. [ECF No. 12410].

33. On July 24, 2020, the Court entered the *Omnibus Order Awarding (I). Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Eighth Interim (October 1, 2019-January 31, 2020) and Prior Compensation Periods; (II) Final Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Final Fee Period* [ECF No. 13824] (the “Third Interim Fee Order”). Pursuant to the Third Interim Fee Order, GJB was awarded \$1,171,906.40 in fees and reimbursement of expenses in the amount of \$33,296.95.

34. On November 16, 2020, GJB filed its Fourth Interim Fee Application for the period from February 1, 2020 through August 31, 2020 [ECF No. 15142] (the “Fourth Interim Fee Application”).

35. On March 8, 2021, the Court entered the *Omnibus Order Awarding (I). Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Eighth Interim (June 1, 2020-September 30, 2020) and Prior Compensation Periods; (II) Final Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Final Fee Period* [ECF No. 15971] (the “Fourth Interim Fee Order”). Pursuant to the Fourth Interim Fee Order, GJB was awarded \$887,215.80 in fees and reimbursement of expenses in the amount of \$54,671.58.

36. On April 15, 2021, GJB filed its Fifth Interim Fee Application for the period from September 1, 2020 through January 31, 2021 [ECF No. 16068] (the “Fifth Interim Fee Application”).

37. On August 3, 2021, the Court entered the *Omnibus Order Awarding (I). Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Eleventh Interim (October 1, 2020-January 31, 2021) and Prior Compensation Periods*; [ECF No. 17646] (the “Fifth Interim Fee Order”). Pursuant to the Fifth Interim Fee Order, GJB was awarded \$393,780.03 in fees and reimbursement of expenses in the amount of \$28,860.55.

38. On April 15, 2021, GJB filed its Sixth Interim Fee Application for the period from February 1, 2021-May 1, 2021 [ECF No. 17365] (the “Sixth Interim Fee Application”).

39. On October 4, 2021, the Court entered the *Omnibus Order Awarding (I). Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Twelfth Interim (February 1, 2021-May 31, 2021) and Prior Compensation Periods* [ECF No. 18371] (the “Sixth Interim Fee Order”). Pursuant to the Sixth Interim Fee Order, GJB was awarded \$260,272.72 in fees and reimbursement of expenses in the amount of \$35,727.69.

40. On November 15, 2021, GJB filed its Seventh Interim Fee Application for the period from June 1, 2021 through September 30, 2021 [ECF No. 19219] (the “Seventh Interim Fee Application”).

41. On March 18, 2022, the Court entered the *Omnibus Order Awarding: Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Thirteenth Interim (June 1, 2021 – September 30, 2021) and Prior Compensation Periods* [ECF No. 20412] (the “Seventh Interim Fee Order”). Pursuant to the Seventh Interim Fee Order, GJB was awarded \$163,364.88 in fees and reimbursement of expenses in the amount of \$30,614.97.

42. On August 31, 2022, GJB filed its Eighth Interim Fee application for the period from October 1, 2021 – December 31, 2021 [ECF No. 21992] (the “Eighth Interim Fee Application”).

43. On October 28, 2022, the Court entered the *Supplemental Omnibus Order Awarding: Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Fifteenth Interim (February 1, 2022 – May 31, 2022) and Prior Compensation Periods* [ECF No. 22727] (the “Eighth Interim Fee Order”). Pursuant to the Eighth Interim Fee Order, GJB was awarded \$278,543.20 in fees and reimbursement of expenses in the amount of \$19,344.38.

COMPENSATION AND REIMBURSEMENT REQUEST

44. By this Application, GJB seeks an order authorizing (a) allowance of final compensation for professional services rendered to the Committee during the Application Period in the aggregate amount of \$147,175.50 and (b) allowance of reimbursement of actual and necessary expenses incurred by GJB in the aggregate amount of \$11,922.93. These amounts were for legal services provided to the Committee in connection with the Commonwealth Title III case.

45. During the Application Period, GJB attorneys and paraprofessionals expended a total of 341.80 hours for which compensation is requested. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Committee.

46. The Committee has approved the amounts requested by GJB for services performed and expenses incurred in each of the monthly statements submitted to the Notice Parties as outlined in the Third Interim Compensation Order.

47. During the Application Period, GJB submitted one (1) Monthly Fee Statement. The Monthly Fee Statement for the period from January 1, 2022 - January 31, 2022 was submitted and

served on the Notice Parties on June 30, 2022 (the “Monthly Fee Statement”) a copy of which is attached as Schedule 2. The objection deadline for the Monthly Fee Statement was July 11, 2022. GJB received no objection to the Monthly Fee Statement.

48. As of the date of the filing of this Application, GJB has received payment for fees and costs of \$64,368.00 for services rendered during the Application Period for the month of January, 2022.

49. As a courtesy to the Committee and based on circumstances unique to the Title III Case, during the Application Period GJB voluntarily applied a 20% discount of its hourly rates totaling \$29,435.10. For details regarding the waived fees, please see the Certification of Mariaelena Gayo-Guitian filed concurrently.

50. By this Application, GJB requests allowance of all fees and expenses incurred for services rendered during the Application Period. At this time, GJB seeks approval and payment of (a) 100% of its fees for services invoiced during the Application Period and (b) 100% of expenses invoiced during the Application Period. The time billed by these timekeepers was reasonable, and GJB reserves the right to seek allowance and payment of these fees based on the facts and circumstances of these cases, including, without limitation, if objections are interposed to the allowance or payment of GJB’s fees and expenses.

51. There is no agreement or understanding between GJB and any other person other than the attorneys, employees, and staff of GJB, for the sharing of compensation to be received for services rendered in these cases.

52. GJB maintains computerized records, in the form of monthly statements, of the time spent by all GJB’s attorneys and paraprofessionals in connection with its representation of the Committee. The monthly statements are in the same form regularly used by GJB to bill its clients for services rendered and include the date that the services were rendered, a detailed, and

contemporaneous narrative description of the services provided, the amount of time spent for each service, and the designation of the professional who performed the service.

53. The fees charged by GJB in the Title III Case are billed in accordance with its existing billing rates and procedures in effect during the Application Period. The rates GJB charges for the services rendered by its professionals and paraprofessionals in the Title III Case are comparable to the rates GJB charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters.

54. GJB's rates are set at a level designed to fairly compensate GJB for the work of its attorneys and paraprofessionals to cover fixed and routine overhead expenses. GJB operates in a national marketplace for legal services in which rates are driven by multiple factors relating to the individual lawyer, his or her area of specialization, the firm's expertise, performance and reputation, the nature of the work involved, and other factors. Accordingly, GJB set its rates for attorneys and paraprofessionals both in the restructuring group and related litigation groups within the firm by reference to market information and market adjustments by firms considered to be industry peers. Based on this and reviews of contemporaneous time records and fee applications filed in other cases, GJB's endeavors to set the hourly rates for its attorneys and paraprofessionals at levels comparable to those of its principal competitor firms.

55. As is customary, and as permitted pursuant to paragraph 2 of the Retention Order, every year GJB reviews its rate structure and, when appropriate, adjusts its hourly rates based upon (i) the advancing seniority of its professionals and paraprofessionals, (ii) the current market for legal services, (iii) the rates charged for comparable non-bankruptcy services, and (iv) the firm's analysis of the hourly rates being charged by professionals in other law firms.

56. GJB's professional services during the Application Period required an aggregate expenditure of 341.80 recorded hours by GJB's attorneys and paraprofessionals broken down as

follows: partners (172.40), associates (115.10), and paraprofessionals (54.30). During the Application Period, GJB's billing rates for attorneys rendering services in this matter ranged from \$305.00 to \$765.00 per hour. As a courtesy to the Committee, no rate increases were made in January 2022 for the incoming year.

57. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Application Period, but were not processed before the preparation of this Application, or GJB has for any other reason not sought compensation or reimbursement with respect to such services or expenses, GJB reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future application.

58. Pursuant to, and consistent with, the relevant requirements of the Guidelines, as applicable, the following exhibits are attached hereto and incorporated by reference:

- Exhibit A- Certification of Mariaelena Gayo-Guitian
- Exhibit B- contains disclosures regarding "customary and comparable compensation."
- Exhibit C contains a summary of GJB's timekeepers included in this Application.
- Exhibit D contains the budgets for GJB's services during the Application Period.
- Exhibit E contains (a) a summary of the compensation requested as compared to the compensation budgeted for the firm's services during the Application Period, and (b) a further breakdown of the compensation requested by project category and matter number.
- Exhibit E-1 contains summary of compensation requested by project category as compared to budget.
- Exhibit E-2 contains a summary of the expense reimbursements requested by category. An itemized schedule of all such expenses is included in GJB's monthly statements.
- Exhibit F contains a breakdown of compensation and expense reimbursement requested by Debtors and by whether the services

were rendered in Puerto Rico or outside Puerto Rico.

- Schedule 1 contains a list of the professionals providing Services during the Application Period by matter.
- Schedule 2 includes the monthly fee statements covered in this Application.
- Schedule 3 includes the proposed order approving this Application.

SUMMARY OF SERVICES PERFORMED BY GJB DURING THE APPLICATION PERIOD

59. Set forth below is a description of the professional services rendered by GJB during the Application Period broken down by project category. The following services described are not intended to be a comprehensive summary of the work performed by GJB. Detailed descriptions of all services rendered by GJB can be found in the detailed time records reflecting the services performed by GJB's professionals, the time expended by each professional, and the hourly rate of each professional, annexed to the Monthly Fee Statements attached as Schedule 2 and such descriptions are incorporated herein by reference.

60. As special litigation and conflicts counsel to the Committee, GJB has jointly worked on various matters with counsel for the Oversight Board or its Special Claims Committee and has made a concerted effort to perform these services in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved while being mindful to avoid any unnecessary or unreasonable duplication of effort with respect to any incurrence of fees in connection with the adversary proceedings commenced under the Joint Prosecution Stipulation. As such, GJB has carefully reviewed its staffing needs on a monthly basis and taken affirmative steps to avoid charges for duplicative services. For example, the work performed by GJB was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Moreover, whenever possible, GJB sought to minimize the costs of GJB's services to the Committee by

utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. In addition, a small group of the same GJB attorneys was utilized for the vast majority of the work in these Title III cases to minimize the costs of intra-GJB communication and education about the cases. Notably, as a general matter, no more than two GJB attorneys attended the various hearings held during the Application Period, thereby minimizing the time billed on these hearings.

61. Furthermore, to the extent appropriate, GJB sought to work closely with Paul Hastings as counsel for the Committee and Brown Rudnick LLP (“Brown Rudnick” or “Special Claims Committee Counsel”) as counsel for the Financial Oversight and Management Board, acting through its counsel Proskauer Rose or the Special Claims Committee (the “Oversight Board”), as applicable, in order to eliminate unnecessary duplication and allocate tasks in an efficient manner. In order to minimize duplication, GJB continues to meet with and confer with counsel for the Oversight Board to discuss pending and potential claims and discuss a division of labor and tasks to limit duplication.

62. In sum, GJB respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to the Committee, and were rendered to protect, preserve, and maximize the value for unsecured creditors during the pendency of these Title III cases. Accordingly, in light of the nature and complexity of these Title III cases, GJB’s charges for professional services performed and expenses incurred are reasonable under applicable standards. For all these reasons, GJB respectfully requests that the Court grant the Application and allow final compensation for professional services performed and reimbursement for expenses as requested.

63. For ease of reference and transparency purposes, GJB created several matter numbers for its representation of the Committee. The matter numbers are divided as follows:

Matter ID	Matter Name
001	Official Committee of Unsecured Creditors
002	PREPA Adversary Litigation
003	ERS Adversary Litigation
004	HTA Adversary Litigation
005	Kobre & Kim Investigation Report Database Review

I. Official Committee of Unsecured Creditors of Commonwealth of Puerto Rico

(Matter ID 001)

(a) Case Administration (Task Code B110)

Fees: \$6,052.50 Total Hours: 13.8

64. During the Application Period, GJB reviewed and developed general case strategy and planning of litigation matters, attended to case management, and participated in meetings with Paul Hastings, Proskauer Rose, Brown Rudnick, and local counsel in Puerto Rico. In order to efficiently track deadlines, organize documents, and manage work streams, GJB created a task list and tracking chart for all adversary proceedings filed which it routinely updates to keep track of deadlines. In addition, during the Application Period, GJB held routine internal team conference calls and occasional meetings to discuss interim and long-term strategies regarding current status of the Title III cases, the Co-Plaintiff Adversary Proceedings, and to manage work assignments and deadlines, while ensuring efficiencies and avoiding duplication and unnecessary overlap.

(b) Pleadings Review (Task Code B113)

Fees: \$8,694.00 Total Hours: 27.60

65. During the Application Period, GJB monitored the case docket for the Title III cases and applicable adversary proceedings. All daily Court filings are reviewed and analyzed. Upon the completion of the Court filing review, an internal memorandum is prepared summarizing each Court filing, upcoming hearings, and noting relevant filings which may impact a proceeding where GJB is serving as special litigation counsel to the Committee.

(c) **Fee/Employment Applications (GJB) (Task Code B160)**

Fees: \$37,934.00 Total Hours: 87.80

66. During the Application Period, GJB prepared one (1) monthly fee statement for services rendered for the month of January, 2022, as well as responding to inquiries from the Fee Examiner. GJB also prepared and filed its Eighth Interim Fee Application and related exhibits [Doc No. 21992]. In connection with the foregoing, GJB prepared and filed its disclosure (the “Verified Statement”) pursuant to the requirements set forth in the Puerto Rico Recovery Accuracy in Disclosures Act, Pub. L. No. 117-82 (“PRRADA”) and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, and further pursuant to this honorable Court’s *Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* (the “PRRADA Order”) [Docket No. 20467].

(d) **Budgeting (Task Code B161)**

Fees: \$345.00 Total Hours: 0.60

67. During the Application Period, GJB reviewed Budget and staffing issues and procedures in connection with the preparation, submission and approval of same. GJB prepared the monthly budget for February, 2022, as required by the Fee Examiner and Interim Fee Orders.

(e) **Fee/Employment Objections (Task Code B170)**

Fees: \$4,537.50 Total Hours: 9.0

68. During the Application Period, GJB, among other things, had communications with Mr. Nicholas Hahn related to PRRADA Disclosures. Additionally, GJB had communications with the Fee Examiner related to resolution of comments and objections to GJB’s Eighth Interim Fee Application.

(f) **General Litigation (Task Code B191)**

Fees: \$14,053.00 Total Hours: 46.70

69. During this Application Period, GJB has continued its representation as special

litigation and conflicts counsel to the Committee in connection with various adversary proceedings associated with the Title III cases. In addition to monitoring the modified Plan filings and observing Plan confirming hearings, GJB is currently prosecuting seven (7) adversary proceedings associated with Debtor, Commonwealth of Puerto Rico (Case No. 17-3283). GJB represents the Committee with respect to a limited “garden-variety” avoidance action against Merck Sharp & Dohme (I.A.) LLC [Adv. Proc. No. 19-276], Great Educational Services Corp [Adv. Proc. No. 19-277] and Eastern America Insurance Agency, Inc. [Adv. Proc. No. 19-279] whom received preferential and fraudulent transfers before the petition date. The adversary proceeding against Eastern America Insurance Agency, Inc. was voluntarily dismissed on February 16, 2021 [ECF No. 16]. Additionally, adversary defendant Great Educational Services Corporation filed for bankruptcy relief under Chapter 7 of the Bankruptcy Code, *Bankruptcy Case No. 19-02901*. In Adv. No. 19-280, GJB is seeking a judgment in excess of four billion dollars against numerous financial institutions and advisors whom negligently underwrote numerous bond obligations despite knowing the Commonwealth was in a state of insolvency for their financial gain (the “Underwriter Litigation”). With regard to the Underwriter Litigation, GJB is involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the defendants in the Underwriter Litigation. The Underwriter Litigation case is stayed pending decision on Confirmation of Amended Plan per Court Order. Furthermore, GJB has been involved in the representation of the Committee in a subset of adversary proceedings seeking to recover, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers of approximately \$9 billion dollars in general obligation bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288] (the “Clawback Litigation”). The Clawback Litigation cases are stayed pending decision on the confirmation of plan per Court Order. However, a Fifth Amended Adversary

Complaint was filed on March 4, 2021 in the adversary proceeding against Defendant 1L, *et al*, [Adv. No. 19-283]. Additionally, the Committee has dismissed certain Defendants in Adv. Proc. Nos 19-281 and 19-282. Additionally, in Adv. No. 19-297, GJB is challenging the validity, enforceability and extent of alleged pre-petition liens of the Commonwealth's general obligation and guaranteed bonds (the "GO Lien Challenges"). In connection with the foregoing, GJB has been working with Committee and Special Claims Committee counsel and monitoring the establishment and extension of Case Management Procedures and Approval of Settlements related to those litigation matters it is handling. GJB has also provided, from time-to-time, additional assistance to Committee counsel with respect to litigation matters within GJB's subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters. GJB has continued its representation of the Committee in certain adversary cases associated with Debtor Puerto Rico Electric Power Authority ("PREPA"); Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"); and Puerto Rico Highways and Transportation Authority ("HTA") as further described below. Those adversary proceedings include: (A) two adversary proceedings involving or relating to the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. Nos. 19-388-LTS, and 20-115-LTS]; (B) six adversary proceedings in connection with the ERS litigation which is seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds adversary proceedings involving {Adv. Pro. Nos. 19-355, 19-356, 19-357, 19-359, 19-361 and 19-367}; and (C) one adversary proceeding challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364].

(g) **Meeting and Communications with Board (Task Code B211)**
Fees: \$345.00 Total Hours: 2.30

70. During this Application period, GJB prepared and submitted various Monthly Fee Objection Letters and with invoices for review and approval.

(h) Meeting and Communications with Board (Task Code B260)

Fees: \$460.00 Total Hours: 0.80

71. During the Application Period, GJB had communications with the Committee regarding case strategy and case updates.

II. PREPA (Matter ID 002)

(a) Case Administration (Task Code B110)

Fees: \$238.50 Total Hours: 0.30

72. During the Application period, GJB reviewed emails from counsel for the Defendants and committees regarding certain claims asserted in the Amended Complaint. GJB had discussions regarding the Exhibits and next steps. GJB prepared status report.

(b) General Litigation (Task Code B191)

Fees: \$74,909.50 Total Hours: 152.50

73. During the Application Period, GJB reviewed and analyzed various pleadings filed in the PREPA matter in addition to monitoring pending tolling agreement deadlines and tracking expiration deadlines of same. GJB paralegals prepared, reviewed and analyzed services and notices. GJB continued its representation of the Committee in connection with the Rule 9019 Motion, as well as in certain adversary cases pursuing the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS]. GJB is also defending the Committee's interest in an adversary proceeding involving a complaint for declaratory judgment alleging that the claims asserted by the Oversight Board and Committee in Adv. Pro. 19-388-LTS are not assets of the estate [Adv. Pro. No. 20-00015-LTS]. During the Application Period, GJB was involved in extensive litigation in Adv. Pro. No. 19-00388. The Marrero Parties filed their Rule 24(c) pleading to intervene in the adversary proceeding, and Defendants filed their Motion to Dismiss the Third Amended Complaint. GJB conducted expansive research in addition to numerous meetings with co-counsel to prepare the Committee's

Joinder in the Special Claims Committee's Limited Objection to the Rule 24(c) pleading, including review of the Marrero Parties' Response to the Objection and Joinder and Defendants' Joint Response to the Rule 24(c) Pleading, as well as preparing a Limited Reply to the Response, resulting in an Order from the Court limiting the Marrero Parties' intervention rights.

Additionally, during the Application Period, GJB reviewed pleadings filed in the related Vitol Adversary as it related to claims and defenses of the Defendants in Adv. Pro. No. 19-388. In addition, GJB conferred with counsel to prepare a Motion for Relief from Stay and Joint Status reports regarding the Vitol Defendants' responsive pleadings in Adv. Pro. 19-388.

III. ERS (Matter ID 003) – N/A

74. During the Application Period there was no time billed in this matter.

IV. HTA (Matter ID 004) –

(a) General Litigation (Task Code B191)

Fees: \$230.00 Total Hours: 0.40

75. During the Application Period, GJB continued review of tolling agreements with various parties.

V. Kobre & Kim Investigation Report Database Review (Matter ID 005)- N/A

76. During the Application Period there was no time billed in this matter.

ATTENDANCE AT HEARINGS

77. In accordance with the presumptions set forth in the *Order on Fee Examiner's Motion to Impose Presumptive Standards and Timeliness Requirements for Professional Fee Applications* [Docket No. 3932] (the "Presumptive Standards Order"), GJB provides the following summary regarding the attendance of GJB's professionals at Court hearings:

- GJB did not attend Court hearings during the Application Period.

ACTUAL AND NECESSARY DISBURSEMENTS

78. As set forth in Exhibit D-2, GJB disbursed \$11,922.93 as expenses incurred in providing professional services during the Application Period.

79. The time constraints imposed by the circumstances of the matters handled by GJB during the Application Period required its attorneys and other employees, at times, to devote substantial time during the evenings and on weekends to perform legal services on behalf of the Committee. These extraordinary services were essential to meet deadlines, timely respond to inquiries on a daily basis, and satisfy the Committee's needs and demands. Attorneys and other GJB employees who worked late in the evenings or on weekends were reimbursed for their reasonable meal and transportation costs in accordance with the Local Rules and firm policy. GJB's regular practice is not to include components for those charges in overhead when establishing billing rates, but rather to charge its clients for these and all other out-of-pocket disbursements incurred during the regular course of the provision of legal services.

80. GJB believes the rates for charges incurred are the market rates that the majority of law firms charge clients for such services. In addition, GJB believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

REQUESTED COMPENSATION SHOULD BE ALLOWED

81. Section 316 of PROMESA provides for the compensation of professionals. Specifically, section 316 provides that a court may award a professional employed by a committee under section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered and reimbursement for actual, necessary expenses." PROMESA § 316(a). Section 316 also sets forth the criteria for the award of such compensation and reimbursement:

- (a) In determining the amount of reasonable compensation to be awarded to a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including:
 - (i) the time spent on such services;
 - (ii) the rates charged for such services;
 - (iii) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this chapter;
 - (iv) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
 - (v) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the restructuring field; and
 - (vi) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title or title 11, United States Code.

PROMESA § 316(c). Further, section 317 of PROMESA provides that “a committee may apply to the court not more than once every 120 days for such compensation for services rendered.

82. In the instant case, GJB respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary for and beneficial to the Committee, the Debtors, and their stakeholders and were rendered to protect, preserve, and maximize value for unsecured creditors during the pendency of the Title III Cases. The services rendered to the Committee were performed in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved. The results obtained to date have benefited not only the Committee but also the Debtors, their stakeholders, and other interested parties. Accordingly, the compensation requested is reasonable in light of the nature, extent, and value of such services to the Committee, the Debtors, and all parties in interest.

83. The work conducted was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Whenever possible, GJB sought to minimize the costs of GJB's services to the Committee by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. A small group of the same GJB attorneys was utilized for the vast majority of the work in order to minimize the costs of intra-GJB communication and education about the Title III Cases. As demonstrated by this Application, GJB spent its time economically and without unnecessary duplication. Accordingly, approval of the compensation sought herein is warranted.

NOTICE

84. In accordance with the Interim Compensation Order, GJB will provide notice of this Application to (i) the attorneys for the Oversight Board, Proskauer Rose LLP and O'Neill & Borges LLC; (ii) the attorneys for the Puerto Rico Fiscal Agency and Financial Advisory Authority, O'Melveny & Myers LLP and Marini Pietrantoni Muñiz LLC; (iii) the Office of the United States Trustee for the District of Puerto Rico; (iv) the attorneys for the Official Committee of Retired Employees, Jenner & Block LLP and Bennazar, García & Milián, C.S.P.; (v) the Puerto Rico Department of Treasury; (vi) the Fee Examiner, Brady Williamson; and (vii) counsel to the Fee Examiner, Godfrey & Kahn, S.C. and EDGE Legal Strategies, PSC. In addition, the notice of hearing with respect to this Application will be served on all parties that have filed a notice of appearance in the Title III Cases.

CONCLUSION

WHEREFORE, GJB respectfully requests entry of an order, substantially in the form attached hereto as Schedule 3, (i) allowing final compensation for professional services rendered during the Application Period in the amount of \$147,175.50, representing 100% of the fees billed during the Application Period plus 10% holdbacks in the amount \$11,774.04 (not including GJB's

voluntary fee reduction equal to 20% in the amount of \$29,435.10) and reimbursement of \$11,922.93, representing 100% of the actual and necessary expenses incurred during the Application Period (ii) authorizing and directing the Debtors' payment of the fees allowed (net of credits for fee reductions) plus 100% of the expenses allowed and any amounts paid by the Debtors pursuant to the Third Interim Compensation Order, (iii) allowing such compensation and payment for professional services rendered and reimbursement of actual and necessary expenses incurred be without prejudice to GJB's right to seek such further compensation and/or payment for the full value of services performed and expenses incurred, and (iv) granting GJB such other and further relief as is just.

Dated: November 15, 2022.

/s/ Mariaelena Gayo-Guitian

GENOVESE JOBLOVE & BATTISTA, P.A.

John H. Genovese, Esq. (*Pro Hac Vice*)

Mariaelena Gayo-Guitian, Esq. (*Pro Hac Vice*)

100 SE 2nd Street, Suite 4400

Miami, FL 33131

Telephone: (305) 349-2300

jgenovese@gjb-law.cdom

mguitian@gjb-law.com

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

/

**CERTIFICATION OF MARIAELENA GAYO-GUITIAN, ESQ. IN SUPPORT OF
NINTH & FINAL FEE APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A.,
AS SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR PERIOD FROM JANUARY 1, 2022 – JULY 31, 2022**

I, Mariaelena Gayo-Guitian certify that the following is true to the best of my knowledge information, and belief:

1. I am an attorney and partner of Genovese Joblove & Battista, P.A. (“GJB”), with four offices in Florida located at 100 SE 2nd Street, Suite 4400, Miami, FL 33131 (“Miami”); 200 East Broward Blvd, Suite 1110, Fort Lauderdale, FL 33301 (“Ft. Lauderdale”), and 100 N. Tampa Street, Suite 2600, Tampa, FL (“Tampa”). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. I am admitted to practice law in the state of Florida. By order dated April 16, 2019,

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

I was admitted to appear *Pro Hac Vice* in the Debtors Title III Cases [Docket No. 6330].

3. I am duly authorized to make this Certification on behalf of GJB. The facts set forth in this Certification are based upon my personal knowledge, my discussions with other GJB attorneys, and the review of GJB's client/matter records by me or other GJB attorneys acting under my supervision and direction.

4. In accordance with (a) Local Bankruptcy Rule 2016-1 (the "Local Guidelines"), (b) Appendix B of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, effective as of November 1, 2013 (the "U.S. Trustee Guidelines"), and (c) the *Third Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals entered April 12, 2022* (the "Third Interim Compensation Order"), this Certification is made with respect to the *Ninth & Final Application of Genovese Joblove & Battista, P.A., as Special Litigation Counsel to Official Committee of Unsecured Creditors, for Services Rendered and Reimbursement of Expenses for the Period from January 1, 2022 – July 31, 2022* (the "Application").²

5. Pursuant to section (a)(4) of the Local Guidelines, I hereby certify that I have read the Application and, to the best of my knowledge, information, and belief, formed after reasonable inquiry, (a) the compensation and reimbursement of expenses sought in the Application conforms with the Bankruptcy Code, the Bankruptcy Rules, the U.S. Trustee Guidelines, and the Local Rules, (b) the compensation and reimbursement of expenses are billed at rates no less favorable to the Debtors than those customarily employed by GJB generally (taking into consideration that GJB employs a variety of fee arrangements with its clients, including hourly fees, contingency fees and hybrid fees involving reduced hourly rates and reduced contingency fee percentages) and billed in accordance with the Engagement Letter and Retention Order; and (c) in providing a reimbursable

² Capitalized terms used herein shall have the same meanings given to them in the Application.

services, GJB does not make a profit on that service, whether the service is performed by GJB in-house or through a third party.

6. In accordance with the Engagement Letter and Retention Order, GJB agreed to a voluntary fee reduction equal to 20%, which results in a reduction in fees in the amount of \$29,435.10 in the Application. GJB seeks allowance of all of its fees incurred during the Application Period in the net amount of \$117,740.40, to the extent such amount has not been paid before the hearing scheduled on this Application.

7. GJB provides the following response to the request for information set forth in the U.S. Trustee Guidelines:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Application Period?

Response: Yes. As a courtesy to the Committee and based on circumstances unique to the Title III Case, during the Application Period, GJB agreed to a voluntary reduction of its fees by an amount equal to 20% of the total fees sought to be paid, which reduction totals \$29,435.10.

Question: If the fees sought in this application as compared to the fees budgeted for the Application Period are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: The fees were below the budgeted amount, therefore the request is not applicable.

Question: Have any of the professionals included in this application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: The Application includes approximately 87.80 hours and associated fees of approximately \$37,934.00 related to preparing, reviewing,

and revising GJB's fee statements.

Question: Does this application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: If the application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

Response: No rate increases have occurred since the retention date.

8. I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed this 15th day of November, 2022.

/s/ Mariaelena Gayo-Guitian
Mariaelena Gayo-Guitian, Esq.
GENOVESE JOBLOVE & BATTISTA, P.A.
Mariaelena Gayo-Guitian, Esq. (*Pro Hac Vice*)
100 SE 2nd Street, Suite 4400
Miami, FL 33131
Telephone: (305) 349-2300
mguitian@gjb-law.com

EXHIBIT B

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

CATEGORY OF TIMEKEEPER (using categories already maintained by the firm)	BLENDED HOURLY RATE		
	NON- BANKRUPTCY BLENDED HOURLY RATE	GJB BLENDED HOURLY RATE ¹	GJB BLENDED HOURLY RATE (AFTER 20% REDUCTION) ²
Partner	\$587.92	\$587.92	\$470.33
Counsel	N/A	N/A	N/A
Associate	\$338.14	\$338.14	\$270.51
All timekeepers aggregated	\$430.59	\$430.59	\$344.47

¹ The calculation of GJB's Blended Hourly Rate does not take into account GJB's agreement to reduce its fees by an amount equal to 20% of its total hourly fees.

² For illustrative purposes only.

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS APPLICATION

Name	Title or Position	Department, Group, or Section	Date of First Admission	Fees Billed in this Application	Hours Billed in this Application	Hourly Rate Billed		Number of Rate Increases Since Case Inception
						In this Application	In Eighth Interim Application	
Arrastia, John	Partner	Litigation	1996	\$34,960.00	60.80	\$575.00	\$575.00	0
Friedman, Michael A.	Partner	Bankruptcy	2009	\$12,265.00	22.30	\$550.00	\$550.00	0
Genovese, John H.	Partner	Bankruptcy	1979	\$13,234.50	17.30	\$765.00	\$765.00	1
Suarez, Jesus M.	Partner	Bankruptcy	2008	\$3,350.00	6.70	\$500.00	\$500.00	1
Gayo-Guitian, Mariaelena	Partner	Bankruptcy	1989	\$101,357.00	65.30	\$575.00		
Total Partner:				\$101,357.00	172.40			
Castaldi, Angelo	Associate	Litigation	2015	\$26,635.00	76.10	\$375.00	\$375.00	1
Delgado, Joyce A.	Associate	Litigation	2017	\$12,285.00	39.00	\$315.00	\$315.00	0
Total Associate:				\$38,920.00	115.10			
Hopkins, Colleen	Paralegal			\$78.00	0.40	\$195.00	\$195.00	0
Sardina, Jessey	Paralegal			\$952.50	12.70	\$75.00	\$75.00	0
Scavone-Esser, Carolyn	Paralegal			\$4,320.00	28.80	\$150.00	\$150.00	0
Lambdin, Vonda	Paralegal			\$300.00	2.00	\$150.00	\$150.00	0
Garcia-Montes, Tricia	Paralegal			\$6,898.50	54.30	\$120.00	\$120.00	0
Total Paraprofessional:				\$6,898.50	54.30			
Total:				\$147,175.50	341.80			
Blended Rate:				\$430.59				
Blended Rate Excluding				\$487.92				

EXHIBIT D

BUDGET AND STAFFING PLAN

EXHIBIT D-1

BUDGETS FOR:
February 2022

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET

Period Covered: February 1 through February 28, 2022¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1 through February 28, 2022
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i> <i>Prior Month ~ 10</i> <i>Trailing Two Month Average ~ 12</i>	10
B112 General Creditor Inquiries <i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>	0
B113 Pleadings Review <i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i> <i>Prior Month ~8</i> <i>Trailing Two Month Average ~ 16</i>	15

¹ Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the Committee's agreement to the proposed plan of adjustment and the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee.

B120 Asset Analysis and Recovery	<i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>	0
B130 Asset Disposition	<i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>	0
B140 Relief from Stay / Adequate Protection Proceedings	<i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>	0
B150 Meetings of Creditors' Committee and Communications with Creditors <i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i>	<i>Prior Month ~ ~2</i> <i>Trailing Two Month Average ~3</i>	3
B155 Court Hearings <i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i>	<i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>	10
B160 Employment / Fee Applications <i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i>	<i>Prior Month ~10</i> <i>Trailing Two Month Average ~8</i>	10

B161 Budgeting (Case)	
<p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p> <p style="text-align: center;"><i>Prior Month ~ 2</i></p> <p style="text-align: center;"><i>Trailing Two Month Average ~2</i></p>	2
B165 Fee and Employment Applications of Other Professionals	
<p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p> <p style="text-align: center;"><i>Prior Month ~0</i></p> <p style="text-align: center;"><i>Trailing Two Month Average ~0</i></p>	0
B170 Fee and Employment Objections	
<p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p> <p style="text-align: center;"><i>Prior Month ~ 1</i></p> <p style="text-align: center;"><i>Trailing Two Month Average ~1</i></p>	1
B180 Avoidance Action Analysis	
<p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers as well as requests for settlement that are impacted by such claims. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p> <p style="text-align: center;"><i>Prior Month ~ 10</i></p> <p style="text-align: center;"><i>Trailing Two Month Average ~0</i></p>	10

B185 Assumption / Rejection of Leases and Contracts	
<p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p> <p style="text-align: right;"><i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~ 0</i></p>	0
B190 Other Contested Matters	
<p><i>Notes: This task code includes time spent on all contested matters in the Title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p> <p><i>This task code also includes the research, evaluation, and prosecution of potential objections to the plan of adjustment and disclosure statement, solely as it relates to claims in which Paul Hastings has a conflict.</i></p> <p style="text-align: right;"><i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~ 0</i></p>	2

<p>191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: GJB is responsible for the prosecution of PREPA's claims in AP 388 against the Fuel Oil Defendants, the stay of which has been lifted and briefing underway.</i></p> <p><i>GJB is responsible for the litigation involving the Catesby-Jones/Marrero Class Action Plaintiffs efforts to intervene in AP 388, in direct and collateral litigation, the briefing of which is underway.</i></p> <p><i>GJB is also reviewing claim objections that may impact AP 280, known as the Underwriter Litigation, which is current stayed.</i></p> <p><i>GJB is also responsible for any matters relating to the Underwriter Litigation, to the extent raised during the stay</i></p> <p><i>This task code includes all adversary proceedings, which consist of (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pursuant to Court orders in effect, subject to confirmation, with the expectation that such matters will be resolved as a result of confirmation..</i></p>	<p>Prior Month ~232</p> <p>Trailing Two Month Average ~ 208</p> <p>250</p>
--	--

B195 Non-Working Travel ² <i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i>	<i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>	0
B210 Debtors' Financial Information and Operations/Fiscal Plan <i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i>	<i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>	0
B220 Employee Benefits/Pensions <i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>		0
B230 Financing / Cash Collections <i>Prior Month ~ 0</i> <i>Trailing Two Month Average ~0</i>		0
B231 Security Document Analysis <i>Prior Month ~0</i> <i>Trailing Two Month Average ~0</i>		0

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

B260 Meetings of and Communications with Debtors/Oversight Board	
<i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel, with increased interaction due to briefing schedules in pending matters.</i>	
<i>Prior Month ~ 3</i>	
<i>Trailing Two Month Average ~2</i>	10
B261 Investigations	
<i>Prior Month ~ 0</i>	
<i>Trailing Two Month Average ~0</i>	0
B310 Claims Administration and Objections	
<i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i>	
<i>Prior Month ~ 0</i>	
<i>Trailing Two Month Average ~0</i>	0
B320 Plan and Disclosure Statement	
<i>Notes: This task code includes time spent on matters related to the evolving plan of adjustment for the Title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings, limited to implementing certain discrete plan elements.</i>	
<i>Prior Month ~ 0</i>	
<i>Trailing Two Month Average ~0</i>	0

B420 Restructurings	
<i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and matters related to the pending PREPA RSA) and the related 9019 motion. GJB anticipates continued involvement in these matters to the extent that Paul Hastings is conflicted from the representation</i>	
<i>Prior Month ~ 0</i>	
<i>Trailing Two Month Average ~0</i>	0
TOTAL HOURS	323
TOTAL ESTIMATED FEE³	\$166,367.61
MINUS 20% REDUCTION	\$33,273.52
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$133,094.09

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: February 1 through February 28, 2022

A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) principal adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on January 10, 2019, the litigation in Adv. Proc. No. 19-00388 was stayed through August 17, 2020 at which time a joint status report was issued. The Defendants responded and the issues were briefed for hearing on September 16, 2020, but not heard, and remain under advisement. The remaining issue is the intervention of the Marrero Class Action Plaintiffs, which the parties have agreed to resolve in the Marrero Class Action Plaintiffs’ complaint to declare its right to pursue the claims against the Fuel Oil defendants in Adv. Pro. No. 20-00115. That matter has been resolved, and pursuant to Court Order, the stay has been lifted in Adv. Pro. No. 19-388 for the parties to engage in motion and pleading practice directed to the operative complaint and counterclaims, including renewed claims by the Marrero Class Action Plaintiffs to intervene.

The March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c)*

³ Assumes Blended Rate of \$515.07

Certain Deadlines Related Thereto stays the proceedings pending a decision on confirmation, with a plan of adjustment that will transfer this action to a post-confirmation Avoidance Action Trust.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1 through February 28, 2022	Average hourly rate for period February 1 through February 28, 2022 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1 through February 28, 2022
B191 General Litigation	250
TOTAL HOURS	250

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325]

seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On August 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements*” as amended by subsequent orders.

On August 26, 2021, the Court entered its *Order Staying Vendor Avoidance Actions* [Docket Entry 17977] which stays those avoidance actions that could implicate GJB’s attention.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1 through February 28, 2022	Average hourly rate for period February 1 through February 28, 2022 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1 through February 28, 2022
B191 General Litigation	0
TOTAL HOURS	210

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents

the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and
- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of December other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on January 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1 through February 28, 2022	Average hourly rate for period February 1 through February 28, 2022 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1 through February 28, 2022
B191 General Litigation	0
TOTAL HOURS	250

D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the August 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

This litigation has been resolved among the parties and stayed pending confirmation.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1 through February 28, 2022	Average hourly rate for period February 1 through February 28, 2022 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1 through February 28, 2022
B191 General Litigation	0
TOTAL HOURS	250

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); proceedings relating to terminating the PREPA RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in these matters as it relates to conflict issues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1 through February 28, 2022	Average hourly rate for period February 1 through February 28, 2022 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1 through February 28, 2022
B190 Other Contested Matters	0
TOTAL HOURS	0

GENERAL STAFFING PLAN

Period Covered: February 1 through February 28, 2022⁴

⁴ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i)

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1 through February 28, 2022	Average hourly rate for period February 1 through February 28, 2022 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no adversary proceedings will require discovery and trial preparation; and (iii) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

EXHIBIT D-2

STAFFING PLAN

Period Covered: January 1, 2022 – July 31, 2022

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period 01/01/22 through 07/31/22	Average hourly rate for period 01/01/22 through 07/31/22 (net of 20% reduction)
Partner (20+ Years)	2	\$670	\$536
Partner (10+ Years)	3	\$542	\$433.60
Associate	2	\$332.50	\$266.00
Paraprofessionals	5	\$138.00	\$110.40

EXHIBIT E

SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

EXHIBIT E-1
**SUMMARY OF COMPENSATION REQUESTED BY PROJECT
 CATEGORY**

U.S. TRUSTEE TASK CODE AND PROJECT CATEGORY	January 2022	February 2022	March 2022	April 2022	May 2022	June 2022	July 2022	TOTAL
B110 Case Administration	2.2	2.9	1.50	0.40	2.90	2.40	1.80	14.10
B113 Pleadings Review	13.00	2.60	9.80	0.90	1.30			27.60
B160 Employment / Fee Applications (GJB)	3.70	0.50	45.40	1.00	7.70	27.20	2.30	87.80
B161 Budgeting (Case)	0.60							0.60
B170 Fee and Employment Objections	0.50		2.40			4.50	1.60	9.00
B191 General Litigation	175.8	11.20	1.20	0.50	9.90	0.50	0.50	199.60
B211 Financial Reports		2.30						2.30
B260 Meetings/Communications with Debtors/ Oversight Board	0.80							0.80
TOTAL HOURS:	196.60	19.50	60.30	2.80	21.80	34.60	6.20	341.80
TOTAL FEES:	\$89,400.00	\$7,909.50	\$23,237.00	\$1,376.00	\$7,279.50	\$14,956.50	\$3,017.00	\$147,175.50
MINUS 20% REDUCTION:	\$17,880.00	\$1,581.90	\$4,647.40	\$275.20	\$1,455.90	\$2,991.30	\$603.40	\$29,435.10
TOTAL FEES: (NET OF REDUCTION)	\$71,520.00	\$6,327.60	\$18,589.60	\$1,100.80	\$5,823.60	\$11,965.20	\$2,413.60	\$117,740.40

**FURTHER BREAKDOWN OF COMPENSATION REQUESTED
BY PROJECT CATEGORY AND BY MATTER**

Official Committee of Unsecured Creditors of Commonwealth of PR (Matter ID 001)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	13.8	\$6,052.50
B113 Pleadings Review	27.60	\$8694.00
B160 Fee/Employment Applications	87.80	\$37,934.00
B161 Budgeting	0.60	\$345.00
B170 Fee/Employment Objections	9.00	\$4537.50
B191 General Litigation	46.70	\$14,053.00
B211 Financial Reports (Monthly Operating Reports)	2.30	\$345.00
B260 Meetings and Communications with Board	0.80	\$460.00
TOTAL		\$72,421.00

PREPA (Matter ID 002)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	0.30	\$238.50
B191 General Litigation	152.50	\$74,909.50
TOTAL		\$75,148.00

*ERS (Matter ID 003) –
N/A*

HTA (Matter ID 004) –

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B191 General Litigation	0.40	\$230.00
TOTAL		\$230.00

*Kobre & Kim Report (Matter ID 005) -
N/A*

EXHIBIT E-2

SUMMARY OF EXPENSE REIMBURSEMENTS REQUESTED BY CATEGORY

Category	Amount
Travel Expenses – Airfare	\$0.00
Travel Expenses – Lodging	\$0.00
Travel Expenses - Taxi / Ground Transportation	\$0.00
Travel Expenses – Parking	\$0.00
Meals (while working on Committee matters)	\$0.00
Court call	\$0.00
Long Distance Phone Calls	\$0.00
Process Service Fee	\$0.00
Messenger	\$0.00
Computer Search	\$539.10
Articles and Publications	\$0.00
Court Reporting Services	\$0.00
In-house Black and White Reproduction Charges	\$0.00
Outside Photocopies	\$0.00
Outside Professional Services	\$0.00
Postage/Express Mail	\$0.00
Data Management/Web Hosting	\$11,383.83
Miscellaneous- Website Domain and Maintenance	\$0.00
TOTAL	\$11,922.93

EXHIBIT F

**BREAKDOWN OF COMPENSATION AND EXPENSE REIMBURSEMENT AND BY
WHETHER SERVICES WERE RENDERED IN PUERTO RICO OR OUTSIDE
PUERTO RICO**

January 2022 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth (all outside of Puerto Rico)	\$16,248.00	\$12,998.40 (\$3,249.60)	\$11,698.56	\$0.00	\$11,698.56
Total for PREPA (all outside of Puerto Rico)	\$72,922.00	\$58,337.60 (\$14,584.40)	\$52,503.84	\$0.00	\$52,503.84
Total for ERS (all outside of Puerto Rico)	N/A	N/A	N/A	N/A	N/A
Total for HTA (all outside of Puerto Rico)	\$230.00	\$184.00 (\$46.00)	\$165.60	\$0.00	\$165.60
Grand Total	\$89,400.00	\$71,520.00	\$64,368.00	\$0.00	\$64,368.00

SCHEDEULE 1

LIST OF PROFESSIONALS BY MATTER

Official Comm. of Unsecured Creditors of Commonwealth of PR (Matter ID 001)

Name	Title or Position	Department, Group, or Section
Genovese, John H.	Partner	Bankruptcy
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Arrastia, John	Partner	Litigation
Friedman, Michael	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Litigation
Delgado, Joyce A.	Associate	Litigation
Hopkins, Colleen	Paralegal	Bankruptcy
Sardina, Jessey	Paralegal	Bankruptcy
Garcia-Montes, Tricia	Paralegal	Litigation
Lambdin, Vonda	Paralegal	Bankruptcy
Scavone, Carolyn	Paralegal	Bankruptcy

PREPA (Matter ID 002)

Name	Title or Position	Department, Group, or Section
Genovese, John H.	Partner	Bankruptcy
Arrastia, John	Partner	Litigation
Suarez, Jesus M.	Partner	Bankruptcy
Friedman, Michael	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Litigation
Sardina, Jessey N.	Paralegal	Bankruptcy

*ERS (Matter ID 003)
- N/A*

HTA (Matter ID 004)

Name	Title or Position	Department, Group, or Section
Arrastia, John	Partner	Litigation

*Kobra & Kim Report (Matter ID 005)
- N/A*

SCHEDULE 2

MONTHLY STATEMENTS COVERED IN APPLICATION

(Attached Hereto)

DATE	PERIOD COVERED	TOTAL FEES	20% DISCOUNT	FEES REQUESTED (90%)	HOLDBACK (10%)	EXPENSES REQUESTED
June 30, 2022	January 1, 2022 – January 31, 2022	\$89,400.00	\$17,880.00	\$64,368.00	\$7,152.00	\$0.00



June 30, 2022

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al. Case No. 17-BK-3283 (LTS)*
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. January 2022 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s January 2022 Fee Statement (the “January Fee Statement”) for certain services rendered and expenses incurred during the period ending January 31, 2022.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

Further, in accordance with the Interim Compensation Order, please see attached as **Exhibit “A”** the certification authorizing the submission of the January Fee Statement. Also attached hereto as **Exhibit “B”** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the January Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$3,249.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	106315	\$16,248.00	\$12,998.40	\$11,698.56	\$0.00	\$11,698.56

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$14,584.40)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	106316	\$72,922.00	\$58,337.60	\$52,503.84	\$0.00	\$52,503.84

3. HTA Litigation (“HTA”) 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$46.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	16317	\$230.00	\$184.00	\$165.60	\$0.00	\$165.60

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$89,400.00 plus costs of \$0.00 for a total of \$89,400.00. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in January is equal to \$17,880.00. The costs are \$0.00. Accordingly, GJB seeks payment of \$64,368.00 in fees (90% of the total discounted fees) and \$0.00 in costs (100% of the costs) as detailed in the January Fee Statement for a total of \$64,368.00.

Any objections you may have to the January Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the January Fee Statement, which **July 11, 2022** (“Objection Deadline”). If no party serves an objection to the January Fee Statement on GJB and the other Notice Parties attached hereto as **Exhibit “C”** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$64,368.00 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank: City National Bank of Florida
Beneficiary Bank Address: 100 SE 2nd Street, Miami, FL 33131
Beneficiary Bank ABA: 066004367
Beneficiary Bank SWIFT: CNBFUS3M
Beneficiary Name: GENOVESE JOBLOVE & BATTISTA PA
Beneficiary Account: 30000160777

If an objection is timely served with respect to the January Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

/s/ Mariaelena Gayo-Guitian

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s January fee statement for certain services rendered and expenses incurred during the period ending January 31, 2022.

/s/ Alvin Velazquez _____

Name: Alvin Velazquez
Company: Service Employees International Union
Dated: June 30, 2022

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of January, 2022;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB's taxable year ends on December 31 (the "Tax Year").

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on January 1, 2022 through January 31, 2022, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code"):

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$3,249.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	106315	\$16,248.00	\$12,998.40	\$11,698.56	\$0.00	\$11,698.56

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$14,584.40)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	106316	\$72,922.00	\$58,337.60	\$52,503.84	\$0.00	\$52,503.84

3. HTA Litigation (“HTA”) 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$46.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	16317	\$230.00	\$184.00	\$165.60	\$0.00	\$165.60

8. The invoices submitted in connection with the January Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$89,400.00 plus costs of \$0.00 for a total of \$89,400.00.

9. That under the GJB’s retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$17,880.00 (20% discount). The costs are \$0.00. Accordingly, GJB seeks payment of \$64,368.00 in fees (90% of the total discounted fees) and \$0.00 in costs (100% of the costs) as detailed in the January Fee Statement for a total of \$64,368.00.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 29th day of June, 2022, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantoni Muniz
LLC MCS Plaza, Suite 500
255 Ponce de Le6n Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despins, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hato Rey, PR 00918
Attn: A.J. Bennazar-Zequeira, Esq.

Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury
PO Box 9024140
San Juan, PR 00902-4140
Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury

PROMESA - Official Committee of Unsecured Creditors

,

June 07, 2022

Please Refer to

Invoice Number: 106315

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
 Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000001

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors /

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending January 31, 2022	\$16,248.00
Current Fees and Costs Due	\$16,248.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

June 07, 2022

Please Refer to

Invoice Number: 106315

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
 Special Conflict Counsel

For Professional Services Rendered
 for the period ending January 31, 2022

Date	Initials	Description	Hours	Rate	Amount
B110 Case Administration					
1/5/2022	MAF	Attend transition meeting regarding non-underwriter FT claims among SCC and UCC/litigation trust teams (0.7). [B110]	0.70	\$550.00	\$385.00
1/11/2022	MAF	Review emails concerning status of confirmation order circulated among UCC group (0.2). [B110]	0.20	\$550.00	\$110.00
1/12/2022	MAF	Call with JA regarding issues surrounding amendment to complaint (0.9); review several emails among UCC and SCC group concerning the same (0.4). [B110]	1.30	\$550.00	\$715.00
B113 Pleadings Review					
1/3/2022	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 31, 2021 through January 3, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. [B113]	1.20	\$315.00	\$378.00
1/5/2022	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (.5); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 4 and 5, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (8). [B113]	1.30	\$315.00	\$409.50

Date	Initials	Description	Hours	Rate	Amount
B113 Pleadings Review					
1/11/2022	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 7 through January 11, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. [B113]	1.30	\$315.00	\$409.50
1/17/2022	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 14 through January 17, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. [B113]	1.70	\$315.00	\$535.50
1/18/2022	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 18, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. [B113]	0.80	\$315.00	\$252.00
1/19/2022	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 19, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. [B113]	2.60	\$315.00	\$819.00
1/21/2022	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 20 and 21, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. [B113]	0.90	\$315.00	\$283.50
1/25/2022	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 20 through 25, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. [B113]	1.80	\$315.00	\$567.00
1/28/2022	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 26 through 28, 2022 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. [B113]	1.40	\$315.00	\$441.00

B160 Fee/Employment Applications

Date	Initials	Description	Hours	Rate	Amount
B160Fee/Employment Applications					
1/5/2022	CBH	Receipt and review of invoices and statement for October 2021; download and organization. [B160]	0.40	\$195.00	\$78.00
1/7/2022	CAS	Preparation of Monthly Fee Cover Letter for November, 2021. [B160]	0.50	\$150.00	\$75.00
1/7/2022	CAS	Service of the Monthly Fee Cover Letter and fee statement for November, 2021 to the fee examiner, U.S. Trustee for the District of Puerto Rico and the Oversight Board. [B160]	0.40	\$150.00	\$60.00
1/7/2022	CAS	Service of the Monthly Fee Cover Letter and fee statement for October, 2021 to the fee examiner, U.S. Trustee for the District of Puerto Rico and the Oversight Board. [B160]	0.40	\$150.00	\$60.00
1/7/2022	CAS	Calendar the deadline to object to the monthly fee statements for October and November. [B160]	0.20	\$150.00	\$30.00
1/26/2022	JA	Review and revise Fee Statements. [B160]	0.30	\$575.00	\$172.50
1/27/2022	JA	Revise Fee Statements in conformity with Fee Examiner Guidelines. [B160]	0.30	\$575.00	\$172.50
1/27/2022	JA	Review correspondence from Fee Examiner (.2); email correspondence with Fee Examiner (.1). [B160]	0.30	\$575.00	\$172.50
1/27/2022	CAS	Circulate February 2022 Budget. [B160]	0.20	\$150.00	\$30.00
1/31/2022	JA	Review Memorandum from Fee Examiner relating to Final Fee Applications. [B160]	0.30	\$575.00	\$172.50
1/31/2022	JA	Revise Fee Statements in conifirmy with Fee Examiner Guidelines. [B160]	0.40	\$575.00	\$230.00
B161Budgeting					
1/14/2022	JA	Prepare draft budget. [B161]	0.60	\$575.00	\$345.00
B170Fee/Employment Objections					
1/7/2022	CAS	Preparation of Monthly Fee Cover Letter for October, 2021. [B170]	0.50	\$150.00	\$75.00
B191General Litigation					
1/3/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/4/2022	JA	Revise and analyze Appellate Decision concerning Monoline action against underwriters. [B191]	0.70	\$575.00	\$402.50
1/4/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/4/2022	JNS	Attention to email dated December 29, 2021, from counsel at BrownRudnick regarding tolling agreement (URS and Petrowest) extension for agreements with termination date on December 31, 2021. Print review and and update case file, tracking chart and calendar events. [B191]	0.30	\$75.00	\$22.50

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/5/2022	JA	Confer with UCC regarding pending cases, issues & strategy. [B191]	0.50	\$575.00	\$287.50
1/5/2022	JA	Confer with SCC regarding transfer of files and information to Avoidance Action Trust (.5); confer and strategize with A. Castaldi and J. Suarez (.4). [B191]	0.90	\$575.00	\$517.50
1/5/2022	JA	Review DGC FA Insolvency Analysis. [B191]	0.60	\$575.00	\$345.00
1/5/2022	AMC	Telephone conference with counsel for SCC. [B191]	0.70	\$350.00	\$245.00
1/5/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/6/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/6/2022	JNS	Attention to email dated December 29, 2021, from counsel at BrownRudnick regarding tolling agreement (Cabrera Auto Group, Genesis Security and Petrobras) extension for agreements with termination date on December 31, 2021. Print review and update case file, tracking chart and calendar events. [B191]	0.40	\$75.00	\$30.00
1/7/2022	JA	Review correspondence from SCC regarding transition of Avoidance Actions (.2); review and analyze current matters to be transferred (.3). [B191]	0.50	\$575.00	\$287.50
1/7/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.40	\$75.00	\$30.00
1/10/2022	JA	Receive correspondence regarding Motion to Terminate Stay in Avoidance Action (.2); confer with D. Mack (.2); review update on confirmation and MBIA/National Motion for Reconciliation (.4); review court order on confirmation issues and proposed findings of fact and proposed order (.6); strategize (.3). [B191]	1.70	\$575.00	\$977.50
1/10/2022	MAF	Review memo from PR counsel regarding LPRA avoidance claims, potential pitfalls, strategic issues and recommendations for re-pleading under various theories (0.8); conference with SCC and UCC group regarding strategic issues with respect to draft completion, pleading issues, legal issues, list of tasks (1.0); post call conference with UCC counsel group regarding the foregoing (0.4). [B191]	2.20	\$550.00	\$1,210.00
1/10/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/11/2022	JA	Review multiple updates regarding confirmation. [B191]	0.30	\$575.00	\$172.50

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/11/2022	AMC	Review and analyze Court's Order regarding plan modifications (DE 19721) and analyze filings concerning status of pre-emption issues implicated by Adv. Proc. 20-119 (.4), and review, consider, and analyze proposed confirmation order and corresponding findings of fact (DE 19721-1, -2) (.9). [B191]	1.30	\$350.00	\$455.00
1/11/2022	AMC	Review and analyze provisions of Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico concerning plan consummation and effective date. [B191]	0.30	\$350.00	\$105.00
1/11/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.40	\$75.00	\$30.00
1/12/2022	JA	Review ISSC Stay Relief Motion. [B191]	0.20	\$575.00	\$115.00
1/12/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/13/2022	JA	Review communications and issues regarding inverse condemnation. [B191]	0.30	\$575.00	\$172.50
1/13/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/14/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.20	\$75.00	\$15.00
1/17/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.40	\$75.00	\$30.00
1/18/2022	JA	Review communication from mediation team (.2); confer with SCC regarding transition of underwriter complaint (.1); confer with client (.1); review Findings of Fact to ensure consistency with draft (.3); confer with JP Bado regarding Kobre Kim Report (.1); review Order Confirming Plan for consistency with draft (.3). [B191]	1.10	\$575.00	\$632.50
1/18/2022	AMC	Received and analyzed DE 19798, agenda regarding Jan. 19-20 omnibus hearing. [B191]	0.30	\$350.00	\$105.00
1/18/2022	AMC	Reviewed and analyzed the court's findings of fact re: Confirmation, DE 19812. [B191]	0.70	\$350.00	\$245.00
1/18/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/19/2022	JA	Confer with SCC and opposing counsel regarding transition. [B191]	0.10	\$575.00	\$57.50
1/19/2022	AMC	Detailed review and analysis of the Court's Confirmation Order, and compare against provisions of Eighth Amended Plan. [B191]	2.30	\$350.00	\$805.00
1/19/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/20/2022	JA	Review Order Dissolving Mediation Team. [B191]	0.10	\$575.00	\$57.50
1/20/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.40	\$75.00	\$30.00
1/21/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.40	\$75.00	\$30.00
1/24/2022	JA	Attend to tolling issue (.3); confer with Committee (.2). [B191]	0.50	\$575.00	\$287.50
1/24/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.20	\$75.00	\$15.00
1/25/2022	JA	Email correspondence with UCC regarding tolling (.1); confer with J. Suarez (.2). [B191]	0.30	\$575.00	\$172.50
1/25/2022	AMC	Review of Order concerning requiring conferral [DE 19860], and analyze PRRAD Act concerning same (.3); analyze recent stipulation concerning tolling of statute(s) of limitation [DE 19857] (.1). [B191]	0.40	\$350.00	\$140.00
1/25/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/26/2022	JA	Communicate with client regarding tolling issues. [B191]	0.20	\$575.00	\$115.00
1/26/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. Attention to email regarding comments and revisions of the draft notice of Withdraw. [B191]	0.40	\$75.00	\$30.00
1/27/2022	JNS	Review of daily litigation summary prepared by J. Delgado including calendaring and updating electronic case file. [B191]	0.30	\$75.00	\$22.50
1/27/2022	JNS	Draft Notice of Withdrawal of Appearance and Request to Case Service of Jesus M. Suarez. [B191]	0.40	\$75.00	\$30.00
1/28/2022	JA	Email correspondence to SCC regarding Tolling Agreements. [B191]	0.20	\$575.00	\$115.00
1/28/2022	AMC	Assist with filing and finalizing numerous notices in main case and adversary proceedings. [B191]	0.40	\$350.00	\$140.00
1/28/2022	JNS	Finalize Notices of Withdrawal of Jesus M. Suarez to be filed in each case where GJB is counsel of record. E-File each Notice in its respective case. [B191]	1.40	\$75.00	\$105.00
B260 Board of Directors Matters					
1/14/2022	JA	Committee call regarding case strategy. [B260]	0.50	\$575.00	\$287.50
1/18/2022	JA	Conference meeting with Committee regarding case updates. [B260]	0.30	\$575.00	\$172.50
Total			46.20		\$16,248.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JA	John Arrastia	Senior Partner	11.20	\$575.00	\$6,440.00
MAF	Michael A. Friedman	Partner	4.40	\$550.00	\$2,420.00
AMC	Angelo M. Castaldi	Associate	6.40	\$350.00	\$2,240.00
JAD	Joyce A. Delgado	Associate	13.00	\$315.00	\$4,095.00
CBH	Colleen B. Hopkins	Paralegal	0.40	\$195.00	\$78.00
JNS	Jessey N. Sardina	Paralegal	8.60	\$75.00	\$645.00
CAS	Carolyn A. Scavone	Paralegal	2.20	\$150.00	\$330.00
Total			46.20		\$16,248.00
Current Fees and Costs					\$16,248.00

TASK RECAP

Services		Disbursements		
Category	Hours	Amount	Category	Amount
B110	2.20	\$1,210.00		
B113	13.00	\$4,095.00		
B160	3.70	\$1,253.00		
B161	0.60	\$345.00		
B170	0.50	\$75.00		
B191	25.40	\$8,810.00		
B260	0.80	\$460.00		
	46.20	\$16,248.00		\$0.00

BREAKDOWN BY PERSON

Person		Category	Hours	Amount
JA	John Arrastia	B160	1.60	\$920.00
JA	John Arrastia	B161	0.60	\$345.00
JA	John Arrastia	B191	8.20	\$4,715.00
JA	John Arrastia	B260	0.80	\$460.00
MAF	Michael A. Friedman	B110	2.20	\$1,210.00
MAF	Michael A. Friedman	B191	2.20	\$1,210.00
AMC	Angelo M. Castaldi	B191	6.40	\$2,240.00
JAD	Joyce A. Delgado	B113	13.00	\$4,095.00
CBH	Colleen B. Hopkins	B160	0.40	\$78.00
JNS	Jessey N. Sardina	B191	8.60	\$645.00
CAS	Carolyn A. Scavone	B160	1.70	\$255.00
CAS	Carolyn A. Scavone	B170	0.50	\$75.00
			46.20	\$16,248.00

PROMESA - Official Committee of Unsecured Creditors

,

June 07, 2022

Please Refer to

Invoice Number: 106316

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors / PREPA
 Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA

(Services rendered outside of Puerto Rico)

For fees for professional services	
for the period ending January 31, 2022	\$72,922.00
Current Fees and Costs Due	\$72,922.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

June 07, 2022

Please Refer to

Invoice Number: 106316

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors / PREPA
 Adversary - Puerto Rico Electric Power Authority

For Professional Services Rendered
 for the period ending January 31, 2022

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/3/2022	JA	Confer with D. D'Aquila (.1); review internal memorandum of points and issues (.6); prepare for conference with SCC counsel and strategize (.4); conduct conference with SCC counsel (.6); Outline revisions to amended complaint and strategize (1.;1). [B191]	2.80	\$575.00	\$1,610.00
1/3/2022	MAF	Call with SCC counsel and UCC counsel regarding amended complaint (0.6); consider issues related to 10-year claims and conduct legal research related to the same (1.7). [B191]	2.30	\$550.00	\$1,265.00
1/3/2022	AMC	Detailed review and analysis of source materials for complaint, and prepare internal working memorandum concerning pending issues implicated by dispositive motions filed by defendants in Adv. P. 19-388 (4.1); Prepare for telephonic conference with counsel for the SCC (.7); Attend said telephonic conference (.8). [B191]	5.60	\$350.00	\$1,960.00
1/4/2022	JA	Revise draft of Amended Complaint with attention to Motion to Dismiss issues. [B191]	1.60	\$575.00	\$920.00
1/4/2022	MAF	Continue legal research concerning 10-year claims, effect of timing of assessment, related legal issues (1.6). [B191]	1.60	\$550.00	\$880.00
1/4/2022	AMC	Prepare and revise second amended complaint and conduct related legal research concerning the same. [B191]	8.20	\$350.00	\$2,870.00

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/5/2022	JA	Receive and review Court Order on Intervention (.4); analyze impact of Order (.3); confer with and brief client (.3); confer and strategize with A. Castaldi regarding revisions to Amended Complaint in AP 388 (.8); revise draft Amended Complaint (1.3). [B191]	3.10	\$575.00	\$1,782.50
1/5/2022	JHG	Review and analysis of Court order regarding Marrero claims. [B191]	0.30	\$765.00	\$229.50
1/5/2022	MAF	Continue legal research concerning 10-year claims (2.2); conference with AC regarding the foregoing to prepare for call with SCC counsel (0.6); call with JS regarding PR legal research question (0.2); review case law dealing with section 6502 issues i preparation of discussion with SCC counsel (0.5); call with SCC counsel to discuss strategy with respect to the foregoing and follow up call with AC regarding same (1.5); review and analyze order on Marrero Plaintiffs' Rule 24 pleading and scope of intervention granted under the same (0.8). [B191]	5.80	\$550.00	\$3,190.00
1/5/2022	AMC	Prepare and revise second amended complaint. [B191]	3.60	\$350.00	\$1,260.00
1/5/2022	AMC	Conduct substantial legal research concerning reasonably equivalent value, pleading standards, and burdens concerning the same. [B191]	1.70	\$350.00	\$595.00
1/5/2022	AMC	Conference call with counsel to SCC concerning fraudulent transfer issues. [B191]	1.40	\$350.00	\$490.00
1/5/2022	AMC	Conduct substantial legal research concerning balance sheet insolvency, service insolvency, and municipal insolvency. [B191]	2.30	\$350.00	\$805.00
1/6/2022	JA	Confer and strategize regarding amendments (.6); legal research and analysis (.4); confer and strategize with M. Friedman and A. Castaldi regarding potential amendments to complaint (.6); revise draft complaint (1.1); strategize with J. Genovese (.4); review SCC revisions to draft complaint (.6); consider additional claims to assert in draft complaint and strategize (.6). [B191]	3.90	\$575.00	\$2,242.50
1/6/2022	JHG	Review and analysis of first set of redline to proposed complaint. [B191]	2.20	\$765.00	\$1,683.00
1/6/2022	JHG	Review issues regarding equitable subordination and 502(h) claims. [B191]	1.30	\$765.00	\$994.50

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/6/2022	MAF	Review redline revisions to amended complaint, consider further revisions, apply proposed redlines, focus on revisions necessary to 10-year transfer claims, review notes from conference with SCC counsel concerning the same, apply proposed revisions in redline, and circulate revisions with comments to UCC counsel group (2.6); review several emails among UCC counsel regarding strategic issue / decisions with respect to draft amendment, potential additional claims, additional allegations, and implications related to them (0.6); review of emails among UCC and SCC counsel groups to discuss status of draft amendments (0.2). [B191]	3.40	\$550.00	\$1,870.00
1/6/2022	AMC	Review several technical assessment reports concerning quality of fuel testing and related issues. [B191]	1.30	\$350.00	\$455.00
1/6/2022	AMC	Prepare revisions to complaint in Adv. Proc. No. 19-388. [B191]	3.30	\$350.00	\$1,155.00
1/6/2022	AMC	Research concerning remedies available under Section 548(a)(1)(A). [B191]	0.60	\$350.00	\$210.00
1/6/2022	AMC	Review of prior requests for proposals re: fuel oil purchases and materials concerning PREPA's purchase of No. 2 and No. 6 fuel. [B191]	0.60	\$350.00	\$210.00
1/7/2022	JA	Confer and strategize with A. Castaldi regarding PR law and co-counsel input (.2); review draft complaint (.6); review memorandum from PR counsel (.3); revise and analyze source materials (1.1); revise draft amended complaint (.9). [B191]	3.10	\$575.00	\$1,782.50
1/7/2022	AMC	Exhaustive review and analysis of findings of various Puerto Rico investigations concerning PREPA, declarations of prior PREPA executives, publicly-available discovery in related litigation, and other source materials. [B191]	4.80	\$350.00	\$1,680.00
1/7/2022	AMC	Preparation of second amended complaint, and conduct extensive legal research concerning equitable subordination and s. 502 concerning the same. [B191]	2.90	\$350.00	\$1,015.00
1/7/2022	AMC	Telephone conference with J. Nieves of CST concerning Puerto Rico fraudulent transfer law. [B191]	0.40	\$350.00	\$140.00
1/10/2022	JA	Confer with L. Rappaport (.2); revise draft amended complaint (1.6); confer with SCC team on revisions (.6); review source materials used in drafting (.7); strategize (.6); confer on proposed revisions (.8); strategize with A. Castaldi (.4); additional revisions to draft (1.2). [B191]	6.10	\$575.00	\$3,507.50
1/10/2022	JHG	Analysis of issues related to amendment to complaint. [B191]	3.40	\$765.00	\$2,601.00

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/10/2022	AMC	Review and analysis of legislative materials submitted by La Comisión Especial para el Estudio de las Normas y Procedimientos Relacionados con la Compra y Uso de Petróleo por la Autoridad de Energía Eléctrica y de Integridad Gubernamental. [B191]	1.40	\$350.00	\$490.00
1/10/2022	AMC	Preparation for telephone conference with the Special Claims Committee counsel. [B191]	1.60	\$350.00	\$560.00
1/10/2022	AMC	Prepare and revise second amended complaint. [B191]	1.30	\$350.00	\$455.00
1/10/2022	AMC	Research and analysis of sections 3492 and 3493 of the LPRA and cases applying the same. [B191]	1.40	\$350.00	\$490.00
1/10/2022	AMC	Telephone conference with counsel for SCC and brief post-conference debrief internally. [B191]	1.40	\$350.00	\$490.00
1/10/2022	AMC	Review and analyze EPA consent decree between PREPA and EPA. [B191]	0.60	\$350.00	\$210.00
1/10/2022	AMC	Strategize internally concerning second amended complaint. [B191]	0.40	\$350.00	\$140.00
1/11/2022	JA	Confer with L. Rappaport (.3); revise draft (1.9); strategize with A. Castaldi (.4); strategize with L. Rappaport (.4); review expert reports for source information (.6); review pleadings in Marrero Class Action to ensure consistency (1.7); confer with SCC (.3); strategize and confer with A. Castaldi (.6) confer with SCC (.3); additional revisions to draft (.3). [B191]	6.80	\$575.00	\$3,910.00
1/11/2022	JMS	Research issues concerning Trustee/Fiduciary Pleading Standard in support of amended complaint (1.6). [B191]	1.60	\$500.00	\$800.00
1/11/2022	AMC	Prepare revisions to second amended complaint. [B191]	3.40	\$350.00	\$1,190.00
1/11/2022	AMC	Conduct legal research concerning bad faith / dolo claims under Puerto Rico law and review Articles 1054 and 1220 of the Puerto Rico Civil Code concerning same. [B191]	1.10	\$350.00	\$385.00
1/11/2022	AMC	Comprehensive and extensive review and analysis of PREPA 100+ page responsive pleadings in pending litigation and compare same against allegations in affirmative complaints, and strategize internally concerning the same. [B191]	3.20	\$350.00	\$1,120.00
1/11/2022	AMC	Review of Vitol and Trafigura fuel contracts. [B191]	0.70	\$350.00	\$245.00
1/12/2022	JA	Review production of source documents (1.8); review exhibits (1.1); confer with CST regarding source documents (.1); confer with SCC (multiple) (1.1); revise motion (.8); revise draft of amended complaint (2.1); prepare correspondence to Committee (.4). [B191]	7.40	\$575.00	\$4,255.00
1/12/2022	JHG	Review email regarding transmittal of amended complaint and issues. [B191]	0.20	\$765.00	\$153.00

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/12/2022	JHG	Review Doc. 117 in case 19-00388 LTS. [B191]	0.10	\$765.00	\$76.50
1/12/2022	JHG	Extensive review and analysis of email regarding proposed edits to amended complaint. [B191]	0.80	\$765.00	\$612.00
1/12/2022	JHG	Extensive review of second amended complaint. [B191]	2.40	\$765.00	\$1,836.00
1/12/2022	JHG	Review issues regarding filing joint status report. [B191]	0.40	\$765.00	\$306.00
1/12/2022	JHG	Attend telephone conference regarding amended complaint. [B191]	0.70	\$765.00	\$535.50
1/12/2022	JMS	Provide proposed changes to amended complaint against Fuel Oil Defendants. (1.6); attention to conferences with FOMB/SCC counsel and additional revisions thereto (1.3). [B191]	2.90	\$500.00	\$1,450.00
1/12/2022	MAF	Call with JA regarding issues surrounding amendment to complaint (0.9); review several emails among UCC and SCC group concerning the same (0.4); analyze several emails among SCC and UCC itemizing detailed analysis of pending outstanding issues with respect to proposed amended complaint (0.8); attend call with UCC and SCC counsel group to discuss pending outstanding issues with respect to draft amendment (0.6). [B191]	2.70	\$550.00	\$1,485.00
1/12/2022	AMC	Review and analysis of 2-, 4-, 10-, and 15-year transfer figures concerning second amended complaint and strategize internally concerning the same. [B191]	1.40	\$350.00	\$490.00
1/12/2022	AMC	Review of provisions of plan concerning avoidance actions. [B191]	0.40	\$350.00	\$140.00
1/12/2022	AMC	Strategize concerning finalizing proposed second amended complaint. [B191]	0.20	\$350.00	\$70.00
1/12/2022	AMC	Prepare revisions to latest iteration of second amended complaint and strategize internally concerning the same. [B191]	2.30	\$350.00	\$805.00
1/12/2022	AMC	Review and analyze revisions to second amended complaint circulated by FOMB counsel, and prepare further revisions and analysis concerning said document. [B191]	2.40	\$350.00	\$840.00
1/12/2022	AMC	Telephone conference with counsel for the SCC and post-conference debrief with GJB team. [B191]	0.70	\$350.00	\$245.00
1/12/2022	AMC	Conduct legal research concerning Section 502(h) issues. [B191]	0.70	\$350.00	\$245.00
1/13/2022	JA	Email correspondence with Vitol re: joint status (.2); review SCC edits (.4); confer and strategize with J. Suarez (.1); confer and strategize with A. Castaldi (.3); strategize (.6); confer with SCC (.3); review amended complaint (.6); review comments from FOMB (.1). [B191]	2.60	\$575.00	\$1,495.00
1/13/2022	JHG	Review additional comments from J. Arrastia regarding amended complaint. [B191]	1.30	\$765.00	\$994.50

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/13/2022	JHG	Review additional draft of second amended complaint. [B191]	1.70	\$765.00	\$1,300.50
1/13/2022	JHG	Review additional emails regarding deleting certain counts. [B191]	0.40	\$765.00	\$306.00
1/13/2022	JMS	Review additional issues concerning revisions to complaint (.7); and revise final draft of complaint (1.5). [B191]	2.20	\$500.00	\$1,100.00
1/13/2022	MAF	Review final version of second amended complaint, and numerous correspondence among SCC and UCC counsel group regarding revisions to the same (1.6). [B191]	1.60	\$550.00	\$880.00
1/13/2022	AMC	Review and analyze finalized exhibits prepared by SCC, compare same against prior analyses / versions, and confer internally concerning the same (1.2); Review of additional revisions to second amended complaint circulated Jan. 12 (.4); Detailed review and analysis of second amended complaint (and, later) the finalized amended complaint, prepare revisions to the same, attend to internal communications with team concerning the same, and communicate with Co-Plaintiff's counsel concerning the same (2.8); Review and analyze final motion for leave to amend (.2). [B191]	4.60	\$350.00	\$1,610.00
1/13/2022	AMC	Prepare, revise, and confer with co-Plaintiff counsel concerning status report. [B191]	1.80	\$350.00	\$630.00
1/14/2022	JA	Review revised status report (.2); email correspondence with M. Kelso (.1); prepare, revise, and finalize Joint Status Report (.4); confer with SCC regarding extensions (.1); confer with defendants regarding extensions (.1); confer with A. Castaldi (.1); review Court Order (.1). [B191]	1.10	\$575.00	\$632.50
1/14/2022	JHG	Review motion for relief to amend. [B191]	0.70	\$765.00	\$535.50
1/14/2022	JHG	Review additional proposed edits to second amended complaint and upon information and belief issues. [B191]	1.30	\$765.00	\$994.50
1/14/2022	AMC	Review and analyze revisions made by SCC to joint status report; attend to multiple communications with SCC counsel and Vitol counsel concerning said report; finalize and prepare said report for filing. [B191]	0.40	\$350.00	\$140.00
1/14/2022	JNS	Review and Finalize formatting of Joint Status Report draft, e-file document; download, save and circulate to in-house counsel the e-file stamped copy of the Joint Status Report. [B191]	0.70	\$75.00	\$52.50
1/17/2022	JHG	Review Doc. 126 in 19-00388 status report and analysis regarding second amended complaint and amended answer. [B191]	0.10	\$765.00	\$76.50
1/19/2022	JA	Review Government Parties' Status Report. [B191]	0.20	\$575.00	\$115.00

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/21/2022	JA	Confer with opposing counsel regarding enlargement (.1); confer with SCC (.2); confer with opposing counsel (.1). [B191]	0.40	\$575.00	\$230.00
1/24/2022	JA	Confer with opposing counsel regarding enlargement (.1); review draft motion and order (.1); confer with SCC (.1); confer with opposing counsel (.1). [B191]	0.40	\$575.00	\$230.00
1/25/2022	JA	Review Court Order in AP 388. [B191]	0.10	\$575.00	\$57.50
1/26/2022	MAF	Review status update / analysis of pending matters impacting GJB's representation of the UCC by J Delgado, consider upcoming tasks and deadlines relative to potential conflicts (0.2). [B191]	0.20	\$550.00	\$110.00
Total			150.00		\$72,922.00

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
JA	John Arrastia	Senior Partner	39.60	\$575.00	\$22,770.00
JHG	John H. Genovese	Senior Partner	17.30	\$765.00	\$13,234.50
MAF	Michael A. Friedman	Partner	17.60	\$550.00	\$9,680.00
JMS	Jesus M. Suarez	Partner	6.70	\$500.00	\$3,350.00
AMC	Angelo M. Castaldi	Associate	68.10	\$350.00	\$23,835.00
JNS	Jessey N. Sardina	Paralegal	0.70	\$75.00	\$52.50
Total			\$150.00		\$72,922.00

Current Fees and Costs \$72,922.00

TASK RECAP

Services		Disbursements		
Category	Hours	Amount	Category	Amount
B191	150.00	\$72,922.00		
				\$0.00
	150.00	\$72,922.00		

BREAKDOWN BY PERSON

Person		Category	Hours	Amount
JA	John Arrastia	B191	39.60	\$22,770.00
JHG	John H. Genovese	B191	17.30	\$13,234.50
MAF	Michael A. Friedman	B191	17.60	\$9,680.00
JMS	Jesus M. Suarez	B191	6.70	\$3,350.00
AMC	Angelo M. Castaldi	B191	68.10	\$23,835.00
JNS	Jessey N. Sardina	B191	0.70	\$52.50
			150.00	\$72,922.00

PROMESA - Official Committee of Unsecured Creditors

,

June 07, 2022

Please Refer to

Invoice Number: 106317

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors / HTA
 Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending January 31, 2022	\$230.00
Current Fees and Costs Due	\$230.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

June 07, 2022

Please Refer to

Invoice Number: 106317

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors / HTA
 Litigation - Puerto Rico Highways & Transportation Authority

For Professional Services Rendered
 for the period ending January 31, 2022

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
1/21/2022	JA	Review HTA GUC Treatment Proposal. [B191]	0.40	\$575.00	\$230.00
		Total	0.40		\$230.00

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
JA	John Arrastia	Senior Partner	0.40	\$575.00	\$230.00
		Total	\$0.40		\$230.00
		Current Fees and Costs			\$230.00

TASK RECAP

Services		Disbursements		
Category	Hours	Amount	Category	Amount
B191	0.40	\$230.00		
	0.40	\$230.00		\$0.00

BREAKDOWN BY PERSON

Person		Category	Hours	Amount
JA	John Arrastia	B191	0.40	\$230.00
			0.40	\$230.00

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107750

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
 Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000001

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors /

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending February 28, 2022	\$6,307.00
Costs incurred and advanced	\$11,383.83
Current Fees and Costs Due	\$17,690.83

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107750

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
Special Conflict Counsel

For Professional Services Rendered
for the period ending February 28, 2022

Date	Initials	Description	Hours	Rate	Amount
B110 Case Administration					
2/1/2022	JA	Conference with Tolled parties regarding case status (.3); revise settlement materials from stayed avoidance target (.8); telephone conference with counsel for avoidance actions (.3); conference with client (.2). [B110]	1.60	\$575.00	\$920.00
2/2/2022	JA	Conference with SCC & Tolled party counsel regarding case strategies. [B110]	0.30	\$575.00	\$172.50
2/2/2022	JA	Prepare fee statements in conformity with fee examiner guidelines. [B110]	0.40	\$575.00	\$230.00
2/2/2022	JA	Conference with client representative regarding status. [B110]	0.30	\$575.00	\$172.50
B113 Pleadings Review					
2/3/2022	JAD	Review correspondence in Title III cases and adversary proceedings for January 29 through February 3, 2022 in order to prepare and circulate brief summary and memorandum of law. [B113]	2.60	\$315.00	\$819.00
B160 Fee/Employment Applications					
2/28/2022	MGG	Confer with Joyce Delgado on deadline for filing interim application and order setting deadline. [B160]	0.50	\$575.00	\$287.50
B191 General Litigation					
2/3/2022	JA	Review plan confirmation materials (.2); review motions for stay pending appeal (.3); review motion for briefing schedule (.1). [B191]	0.60	\$575.00	\$345.00

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
2/3/2022	JNS	Attention to email from Blair M Rinne enclosing the tolling agreement amendments for Greenberg Traurig, LLP and Nixon Peabody LL. Download, review, circulate for signature of attorney John Arrastia, scan and circulate back via email to Blair Ronni. Update case file with executed copies, calendar new deadlines (.6). [B191]	0.60	\$75.00	\$45.00
2/4/2022	JA	Prepare for and conduct meeting with Tolled party regarding status of AP280 (.4); prepare for and conduct meeting with defendant regarding settlement of claims (.7); conference with Tolled party regarding avoidance action (.6). [B191]	1.70	\$575.00	\$977.50
2/4/2022	JNS	Attention to e-filed documents (in the absence of Joyce Delgado). Review Dockets and/or any document filed int he Promesa matters, circulate any deadlines. [B191]	0.20	\$75.00	\$15.00
2/7/2022	JA	Continued review of tolling agreement with various parties. [B191]	0.30	\$575.00	\$172.50
2/7/2022	JA	Conference with SCC regarding status report (.2); conference with opposing counsel (.1). [B191]	0.30	\$575.00	\$172.50
2/7/2022	JNS	Attention to e-filed documents (in the absence of Joyce Delgado). Review Dockets and/or any document filed int he Promesa matters, circulate any deadlines. [B191]	0.30	\$75.00	\$22.50
2/8/2022	JA	Alternative to various tolling agreements. [B191]	0.40	\$575.00	\$230.00
2/8/2022	JNS	Attention to e-filed documents (in the absence of Joyce Delgado). Review Dockets and/or any document filed int he Promesa matters, circulate any deadlines. [B191]	0.30	\$75.00	\$22.50
2/9/2022	JA	Conference with SCC regarding transition of pending litigation. [B191]	0.60	\$575.00	\$345.00
2/9/2022	JNS	Attention to e-filed documents (in the absence of Joyce Delgado). Review Dockets and/or any document filed int he Promesa matters, circulate any deadlines. [B191]	0.30	\$75.00	\$22.50
2/10/2022	JA	Continuing attention to additional Tolling agreements. [B191]	0.30	\$575.00	\$172.50
2/10/2022	JNS	Attention to e-filed documents (in the absence of Joyce Delgado). Review Dockets and/or any document filed int he Promesa matters, circulate any deadlines. [B191]	0.20	\$75.00	\$15.00
2/11/2022	JA	Continuing attention to tolling agreement. [B191]	0.30	\$575.00	\$172.50
2/11/2022	AMC	Attend to ??? to communications concerning tolling agreements. [B191]	1.60	\$350.00	\$560.00
2/11/2022	JNS	Attention to email from John Arrastilla requesting updated chart of Tolling Agreement Deadlines. Update, download and circulate Tolling Agreement tracking chart. [B191]	0.30	\$75.00	\$22.50
2/11/2022	TGM	Download new data received; forward to Trustpoint for loading to Relativity. [B191]	0.40	\$120.00	\$48.00

Date	Initials	Description	Hours	Rate	Amount
B211 Financial Reports (Monthly Operating Reports)					
2/24/2022	CAS	Preparation of Monthly Fee Objection Letter for October, 2021. [B211]	0.40	\$150.00	\$60.00
2/24/2022	CAS	Service of Monthly Fee Objection Letter for October, 2021. [B211]	0.20	\$150.00	\$30.00
2/24/2022	CAS	Preparation of Monthly Fee Objection Letter for September, 2021. [B211]	0.40	\$150.00	\$60.00
2/24/2022	CAS	Service of Monthly Fee Objection Letter for September, 2021. [B211]	0.20	\$150.00	\$30.00
2/24/2022	CAS	Preparation of Monthly Fee Objection Letter for November, 2021. [B211]	0.40	\$150.00	\$60.00
2/24/2022	CAS	Service of Monthly Fee Objection Letter for November, 2021. [B211]	0.20	\$150.00	\$30.00
2/24/2022	CAS	Review of December invoices and preparation of Monthly Fee Cover Letter for December, 2021. [B211]	0.50	\$150.00	\$75.00
Total			16.70		\$6,307.00

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
JA	John Arrastia	Senior Partner	7.10	\$575.00	\$4,082.50
MGG	Mariaelena Gayo-Guitian	Partner	0.50	\$575.00	\$287.50
AMC	Angelo M. Castaldi	Associate	1.60	\$350.00	\$560.00
JAD	Joyce A. Delgado	Associate	2.60	\$315.00	\$819.00
TGM	Tricia Garcia-Montes	Paralegal	0.40	\$120.00	\$48.00
JNS	Jessey N. Sardina	Paralegal	2.20	\$75.00	\$165.00
CAS	Carolyn A. Scavone	Paralegal	2.30	\$150.00	\$345.00
Total			16.70		\$6,307.00

Costs incurred and advanced

Date	Description	Amount
01/31/2022	Trustpoint. One- Data management and hosting- Web hosting January 12272-001 [E100 - E124]	\$5,768.16
02/28/2022	Trustpoint. One- Data management and hosting- Data hosting 12272-001 [E100 - E123]	\$5,615.67
Total Costs incurred and advanced		\$11,383.83

Current Fees and Costs	\$17,690.83
------------------------	-------------

TASK RECAP

Services			Disbursements	
Category	Hours	Amount	Category	Amount
B110	2.60	\$1,495.00	E100 - E123	\$5,615.67
B113	2.60	\$819.00	E100 - E124	\$5,768.16
B160	0.50	\$287.50		
B191	8.70	\$3,360.50		
B211	2.30	\$345.00		
	<u>16.70</u>	<u>\$6,307.00</u>		<u>\$11,383.83</u>

BREAKDOWN BY PERSON

Person	Category	Hours	Amount
JA John Arrastia	B110	2.60	\$1,495.00
JA John Arrastia	B191	4.50	\$2,587.50
MGG Mariaelena Gayo-Guitian	B160	0.50	\$287.50
AMC Angelo M. Castaldi	B191	1.60	\$560.00
JAD Joyce A. Delgado	B113	2.60	\$819.00
TGM Tricia Garcia-Montes	B191	0.40	\$48.00
JNS Jessey N. Sardina	B191	2.20	\$165.00
CAS Carolyn A. Scavone	B211	2.30	\$345.00
		<u>16.70</u>	<u>\$6,307.00</u>

100 Southeast Second Street, 44th Floor

Miami, Florida 33131

Telephone: (305) 349-2300 Facsimile: (305) 349-2310

Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107751

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors / PREPA
 Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA

(Services rendered outside of Puerto Rico)

For fees for professional services	
for the period ending February 28, 2022	\$1,602.50
Current Fees and Costs Due	\$1,602.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107751

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors / PREPA
 Adversary - Puerto Rico Electric Power Authority

For Professional Services Rendered
 for the period ending February 28, 2022

Date	Initials	Description	Hours	Rate	Amount
B110 Case Administration					
2/3/2022	MAF	Review emails among counsel for defendants and committees regarding conference on certain claims in amended complaint, discussion of exhibits, next steps (0.2); emails regarding status of senate report documents. [B110]	0.30	\$550.00	\$165.00
B191 General Litigation					
2/3/2022	JA	Prepare for meeting with inspectorate counsel (.3); conference with inspectorate counsel (.3); conference SCC counsel (.3); email correspondence to inspectorate counsel (.3); conference with local counsel organizing investigation (.1). [B191]	1.30	\$575.00	\$747.50
2/9/2022	JA	Conference with opposing counsel (.1); conference with SCC (.1); initiate draft of status report (.4). [B191]	0.60	\$575.00	\$345.00
2/11/2022	JA	Finalize status report (.2); conference with opposing counsel (.1); conference with opposing counsel regarding meet and conference(.3). [B191]	0.60	\$575.00	\$345.00
Total			2.80		\$1,602.50

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
JA	John Arrastia	Senior Partner	2.50	\$575.00	\$1,437.50
MAF	Michael A. Friedman	Partner	0.30	\$550.00	\$165.00

PROMESA - Official Committee of Unsecured Creditors
012272 - 000002

Invoice No.107751

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
	Total		\$2.80		\$1,602.50
	Current Fees and Costs				\$1,602.50

TASK RECAP

Services			Disbursements	
<u>Category</u>	<u>Hours</u>	<u>Amount</u>	<u>Category</u>	<u>Amount</u>
B110	0.30	\$165.00		
B191	2.50	\$1,437.50		
	<u>2.80</u>	<u>\$1,602.50</u>		<u>\$0.00</u>

BREAKDOWN BY PERSON

<u>Person</u>		<u>Category</u>	<u>Hours</u>	<u>Amount</u>
JA	John Arrastia	B191	2.50	\$1,437.50
MAF	Michael A. Friedman	B110	0.30	\$165.00
			<u>2.80</u>	<u>\$1,602.50</u>

100 Southeast Second Street, 44th Floor

Miami, Florida 33131

Telephone: (305) 349-2300 Facsimile: (305) 349-2310

Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107745

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
 Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000001

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors /

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending March 31, 2022	\$23,237.00
Costs incurred and advanced	\$450.70
Current Fees and Costs Due	\$23,687.70

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107745

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
Special Conflict Counsel

For Professional Services Rendered
for the period ending March 31, 2022

Date	Initials	Description	Hours	Rate	Amount
B110 Case Administration					
3/1/2022	CAS	Review various orders setting deadlines and procedures for filing of interim fees. Telephone conference with J. Delgado. E-mail correspondence with M. Guitian. [B110]	0.50	\$150.00	\$75.00
3/8/2022	CAS	Research and review various orders setting Interim Fee Periods for filing fee applications. [B110]	0.50	\$150.00	\$75.00
3/29/2022	MGG	Review Notice of Filing Amended List of Material Interest Parties Pursuant to Puerto Rico Recovery Accuracy Disclosure Act. [B110]	0.50	\$575.00	\$287.50
B113 Pleadings Review					
3/1/2022	JAD	Confer with M. Guitian re: review of filings (.8); review dockets of Title III and adversary cases to determine status of pending filings (.6); confer with M. Guitian re: Fee Application (.2); confer with paralegal C. Scavone re: same (.3); review of main case docket for Interim Fee Order procedures (.5). [B113]	2.40	\$315.00	\$756.00
3/3/2022	JAD	Emails with M. Guitian re: Interim Fee Order. [B113]	0.30	\$315.00	\$94.50
3/9/2022	JAD	Review correspondence with J. Genovese and M. Guitian re: pending fees and Interim Fee Application. [B113]	0.30	\$315.00	\$94.50
3/13/2022	JAD	Correspondence with M. Guitian re: Interim Fee Application. [B113]	0.20	\$315.00	\$63.00
3/14/2022	JAD	Emails with M. Guitian re: Interim Fee Application (.5); emails with paralegal J. Sardina re: same (.5); emails with paralegal C. Scavone re: same (.4). [B113]	1.40	\$315.00	\$441.00

Date	Initials	Description	Hours	Rate	Amount
B113 Pleadings Review					
3/15/2022	JAD	Emails with M. Guitian re: Interim Fee Application (.9); revise Interim Fee Application (.5); confer with M. Guitian re: same (.2); confer with counsel for Fee Examiner (.3); confer with paralegal C. Scavone re: Interim Fee Application (.3); confer with V. Lambdin re: same (.6). [B113]	2.80	\$315.00	\$882.00
3/16/2022	JAD	Emails with M. Guitian re: service of Fee Application (.4); confer with counsel for fee examiner re: same (.4); provide update to M. Guitian re: same (.4). [B113]	1.20	\$315.00	\$378.00
3/18/2022	JAD	Emails with M. Guitian re: appearance at Omnibus Hearing. [B113]	0.30	\$315.00	\$94.50
3/20/2022	JAD	Review emails with M. Guitian re: Interim Fee Order. [B113]	0.30	\$315.00	\$94.50
3/21/2022	JAD	Emails with counsel for Fee Examiner re: appearance at Omnibus Hearing (.2); emails with M. Guitian re: same (.2). [B113]	0.40	\$315.00	\$126.00
3/29/2022	JAD	Emails with M. Guitian re: Notice of Interested Parties. [B113]	0.20	\$315.00	\$63.00
B160 Fee/Employment Applications					
3/1/2022	MGG	Review docket and confirm filing of NOA and substitution by John Arrastia and Jesus Suarez (.3) Review copies of filings (.4) Review status of invoices and notice of interim fee application deadlines (1.0). Follow up with John Arrastia re: December invoice (.3) Review outstanding amounts due to GJB and confer with accounting on open invoices (.7) Email to Executive Committee (.5). Work with Carolyn Scavone on preparation and service of December Invoice (.4). [B160]	3.60	\$575.00	\$2,070.00
3/3/2022	MGG	Research and review various fee orders re: produced and deadlines for upcoming Interim Fee Applications. Various communications with Carolyn Scavone and Joyce Delgado. [B160]	2.30	\$575.00	\$1,322.50
3/3/2022	VLL	E-mail correspondence with M. Guitian, C. Scavone and J. Sardina regarding preparing fee application, review of x-drive for form and reports of prior fee applications (.4) E-mail correspondence with M. Guitian regarding order setting deadlines, review of docket, x-drive, e-mail correspondence/telephone calls with J. Sardina and C. Scavone regarding same (1.0). [B160]	1.40	\$150.00	\$210.00
3/6/2022	MGG	Review Fee Statements and accounting of payments received for preparation of Interim Fee Applications. [B160]	1.00	\$575.00	\$575.00
3/7/2022	MGG	Communications with Jessey Sardina re: preparation of Interim Fee Application. [B160]	0.20	\$575.00	\$115.00

Date	Initials	Description	Hours	Rate	Amount
B160 Fee/Employment Applications					
3/8/2022	MGG	Review and confer with C. Scavone re: service of December Monthly Fee Letter. Follow-up with Ken Forrest regarding same. (.5). Work on accounting details for 8th Interim Fee Application and overall procedures. Review various orders and deadlines related thereto (1.90). [B160]	2.40	\$575.00	\$1,380.00
3/8/2022	CAS	Finalize December 2022 Monthly Fee Letter. [B160]	0.60	\$150.00	\$90.00
3/8/2022	CAS	Serve the December 2022 Monthly Fee Letter to the Fee Examiner, US Trustee and Oversight Board. Calendar objection deadline. [B160]	0.50	\$150.00	\$75.00
3/9/2022	MGG	Communications with C. Scavone and response to John Genovese re: status of Budgets and submission of fee invoices to Committee for approval. [B160]	0.60	\$575.00	\$345.00
3/10/2022	MGG	Confer with Ken Forrest re: billing recap and invoices for 8th Interim Fee Period. Review same. [B160]	1.00	\$575.00	\$575.00
3/12/2022	MGG	Review payment received from Promesa and summary of application and incorporate into Interim Fee Application. Various communications with Ken Forrest re: reports for Interim Fee Application (1.6). Work on Interim Fee Application (1.5). [B160]	3.10	\$575.00	\$1,782.50
3/14/2022	MGG	Continued review of invoices and preparation of 8th Interim Fee Application (2.90). Research docket re: procedures for service and/or filing of Interim Fee Applications and service on Fee Examiner (1.0). Review information on Puerto Rico Recovery Accuracy in Disclosures Act (PRRADA) (.4). [B160]	4.30	\$575.00	\$2,472.50
3/14/2022	CAS	Organize and review October - December invoices and billing reports in preparation of the 8th fee application. [B160]	0.30	\$150.00	\$45.00
3/14/2022	CAS	Revise draft of the Eight Fee Application. [B160]	1.50	\$150.00	\$225.00
3/14/2022	CAS	Revise Schedule 2 Monthly Statements Covered in Application. [B160]	0.40	\$150.00	\$60.00
3/14/2022	CAS	E-mail correspondence and telephone conferences with K. Forrest re: financial reports. [B160]	0.60	\$150.00	\$90.00
3/14/2022	CAS	Revise Certification of Mariaelena Gayo-Gutian, Esq. in Support of Eighth Interim Fee Application of Genovese, Joblove & Battista. [B160]	0.70	\$150.00	\$105.00
3/14/2022	CAS	Revise Exhibit of Prior Interim Fee Applications. [B160]	0.40	\$150.00	\$60.00

Date	Initials	Description	Hours	Rate	Amount
B160 Fee/Employment Applications					
3/15/2022	MGG	Finalize preparation of 8th Interim Fee Application and updates from Ken Forrest re: amounts due and hold-back. Revise Summary of amounts due (6.0) Various communications with Joyce Delgado re: procedure and communications with Fee Examiner's counsel re: procedures for service of Interim Fee Application (.70). Various communications with Clerk's office re: filing credentials (.5). Communications with John Arrastia re: time entries (.4). [B160]	7.60	\$575.00	\$4,370.00
3/15/2022	CAS	Conference with J. Delgado re: Seventh Interim Fee Order and scheduling of Omnibus Hearings for 03/23/22. [B160]	0.30	\$150.00	\$45.00
3/15/2022	CAS	Review report of timekeepers by associates, paralegals, and partners. Attention to blended hourly rates; Update Eighth Interim Fee Application. [B160]	0.70	\$150.00	\$105.00
3/15/2022	CAS	Continue revisions to the Eighth Interim Fee Applications. [B160]	1.80	\$150.00	\$270.00
3/15/2022	CAS	E-mail correspondence to J. Arrastia re: attendance at hearings during the compensation period of October through December. [B160]	0.20	\$150.00	\$30.00
3/15/2022	CAS	Review financial reports and update Exhibit C, Summary of Timekeepers Included In This Application. [B160]	1.30	\$150.00	\$195.00
3/15/2022	CAS	Compile Exhibit D-1 Budgets for October through December. [B160]	0.30	\$150.00	\$45.00
3/15/2022	CAS	Revise Exhibit E - Summary of Compensation Requested by Project Category. [B160]	1.30	\$150.00	\$195.00
3/15/2022	CAS	Revise Exhibit E-2 - Summary of Expense Reimbursements Requested by Category. [B160]	0.40	\$150.00	\$60.00
3/15/2022	CAS	Revise Exhibit F - Breakdown of Compensation and Expense Reimbursement. [B160]	0.50	\$150.00	\$75.00
3/15/2022	CAS	Combine and attach Monthly Fee Letters for October through December. [B160]	0.20	\$150.00	\$30.00
3/15/2022	CAS	Combine and attach monthly invoices for October through December. [B160]	0.20	\$150.00	\$30.00
3/15/2022	CAS	Conferences with V. Lambdin and J. Sardina re: electronic filing issues in U.S. Bankruptcy Court for District of Puerto Rico. [B160]	0.50	\$150.00	\$75.00
3/15/2022	CAS	Finalize and serve Eighth Interim Fee Application. [B160]	2.00	\$150.00	\$300.00
3/15/2022	CAS	Telephone conference with M. Guitian re: revisions to Eighth Interim Fee Application. [B160]	0.70	\$150.00	\$105.00
3/16/2022	MGG	Follow up with counsel to Fee Examiner re: service of Interim Fee Application in lieu of filing. Confer with Joyce Delgado regarding same. [B160]	0.50	\$575.00	\$287.50
3/16/2022	CAS	Interoffice conferences with M. Guitian and J. Delgado re: updated procedures for filing Eighth Interim Fee Application. [B160]	0.70	\$150.00	\$105.00

Date	Initials	Description	Hours	Rate	Amount
B160 Fee/Employment Applications					
3/18/2022	MGG	Communications with Jay Bushman and Ken Forrest re: invoices from Trustpoint.One. Communications with C. Scavone re: monthly invoices and reimbursement of Trustpoint One invoices. Follow up with Mr. Forrest. [B160]	0.50	\$575.00	\$287.50
3/18/2022	MGG	Review Certification of Counsel Regarding Proposed Third Amended Order Setting Procedures for Interim and Final Compensation and Reimbursement of Expenses of Professionals. Communications with Carolyn Scavone and Joyce Delgado regarding same. [B160]	0.50	\$575.00	\$287.50
3/25/2022	MGG	Review Promesa invoice for February. Comments to Ken Forrest regarding same. [B160]	0.30	\$575.00	\$172.50
B170 Fee/Employment Objections					
3/14/2022	CAS	E-mail correspondence with L. Rice regarding reports and final invoices for preparation of fee application. [B170]	0.40	\$150.00	\$60.00
3/22/2022	MGG	Receipt and review Fee Examiners Revised Report on Uncontested Professional Fee Matters for Consideration in Connection with the March 23, 2022 Omnibus Hearing. Email to Executive Committee regarding same. [B170]	0.60	\$575.00	\$345.00
3/24/2022	MGG	Review December fee letter and confer with Carolyn Scavone regarding same (.4). Follow up on status of January and February invoices (.4). [B170]	0.80	\$575.00	\$460.00
3/24/2022	CAS	Preparation of December 2021 Monthly Fee Objection letter. [B170]	0.40	\$150.00	\$60.00
3/24/2022	CAS	Finalize and serve December 2021 Monthly Fee Objection letter. [B170]	0.20	\$150.00	\$30.00
B191 General Litigation					
3/8/2022	JNS	Attention to e-filed documents (in the absence of Joyce Degado). Review Dockets and/or any document filed int he Promesa matters, circulate any deadlines. [B191]	0.30	\$75.00	\$22.50
3/14/2022	JNS	Review last filed Case Management Order (.3). Prepare draft Notice of Filing Eighth Fee Application (.5). Circulate email to Mariaelena Guitian and Joyce Delgado with upcoming omnibus hearing dates. (.1). [B191]	0.90	\$75.00	\$67.50
Total			60.30		\$23,237.00

Timekeeper Summary

ID	Timekeeper Name	Title	BillHours	BillRate	BillAmount
MGG	Mariaelena Gayo-Gutian	Partner	29.80	\$575.00	\$17,135.00
JAD	Joyce A. Delgado	Associate	9.80	\$315.00	\$3,087.00
VLL	Vonda L. Lambdin	Paralegal	1.40	\$150.00	\$210.00
JNS	Jessey N. Sardina	Paralegal	1.20	\$75.00	\$90.00
CAS	Carolyn A. Scavone	Paralegal	18.10	\$150.00	\$2,715.00
Total			\$60.30		\$23,237.00

Costs incurred and advanced

Date	Description	Amount
03/31/2022	PACER Service Center- Online Research- Searches 12272-001 [E100 - E106]	\$293.70
03/31/2022	PACER Service Center- Online Research- Searches 1272-001 [E100 - E106]	\$157.00
Total Costs incurred and advanced		\$450.70
Current Fees and Costs		\$23,687.70

PROMESA - Official Committee of Unsecured Creditors
012272 - 000001

Invoice No.107745

TASK RECAP

Services			Disbursements	
Category	Hours	Amount	Category	Amount
B110	1.50	\$437.50	E100 - E106	\$450.70
B113	9.80	\$3,087.00		
B160	45.40	\$18,667.50		
B170	2.40	\$955.00		
B191	1.20	\$90.00		
	<hr/> <u>60.30</u>	<hr/> <u>\$23,237.00</u>		<hr/> <u>\$450.70</u>

BREAKDOWN BY PERSON

Person	Category	Hours	Amount
MGG	B110	0.50	\$287.50
MGG	B160	27.90	\$16,042.50
MGG	B170	1.40	\$805.00
JAD	B113	9.80	\$3,087.00
VLL	B160	1.40	\$210.00
JNS	B191	1.20	\$90.00
CAS	B110	1.00	\$150.00
CAS	B160	16.10	\$2,415.00
CAS	B170	1.00	\$150.00
	<hr/> <u>60.30</u>	<hr/> <u>\$23,237.00</u>	

100 Southeast Second Street, 44th Floor

Miami, Florida 33131

Telephone: (305) 349-2300 Facsimile: (305) 349-2310

Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107746

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
 Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000001

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors /

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending April 30, 2022	\$1,376.00
Current Fees and Costs Due	\$1,376.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107746

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
Special Conflict CounselFor Professional Services Rendered
for the period ending April 30, 2022

Date	Initials	Description	Hours	Rate	Amount
B110 Case Administration					
4/26/2022	MGG	Communications with Tricia Garcia-Montes re: Promesa and Relativity platform. [B110]	0.40	\$575.00	\$230.00
B113 Pleadings Review					
4/1/2022	JAD	Review docket, Notice of Interested Parties, Amended Notice, and Order Approving same to determine obligations of an interested party under PRRADA (.5); confer with M. Guitian re: same (.4). [B113]	0.90	\$315.00	\$283.50
B160 Fee/Employment Applications					
4/1/2022	MGG	Review Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act and application to GJB. Review Notice of Amended List of Interested Parties. [B160]	1.00	\$575.00	\$575.00
B191 General Litigation					
4/25/2022	MGG	Confer with Tricia Garcia-Montes re: PNB Paribas litigation and e-discovery. [B191]	0.50	\$575.00	\$287.50
Total			2.80		\$1,376.00

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
MGG	Mariaelena Gayo-Guitian	Partner	1.90	\$575.00	\$1,092.50

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
JAD	Joyce A. Delgado	Associate	0.90	\$315.00	\$283.50
	Total		\$2.80		\$1,376.00
Current Fees and Costs					\$1,376.00

TASK RECAP

Services			Disbursements	
<u>Category</u>	<u>Hours</u>	<u>Amount</u>	<u>Category</u>	<u>Amount</u>
B110	0.40	\$230.00		
B113	0.90	\$283.50		
B160	1.00	\$575.00		
B191	0.50	\$287.50		
	<u>2.80</u>	<u>\$1,376.00</u>		<u>\$0.00</u>

BREAKDOWN BY PERSON

<u>Person</u>		<u>Category</u>	<u>Hours</u>	<u>Amount</u>
MGG	Mariaelena Gayo-Guitian	B110	0.40	\$230.00
MGG	Mariaelena Gayo-Guitian	B160	1.00	\$575.00
MGG	Mariaelena Gayo-Guitian	B191	0.50	\$287.50
JAD	Joyce A. Delgado	B113	0.90	\$283.50
			<u>2.80</u>	<u>\$1,376.00</u>

100 Southeast Second Street, 44th Floor

Miami, Florida 33131

Telephone: (305) 349-2300 Facsimile: (305) 349-2310

Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107747

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
 Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000001

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors /

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending May 31, 2022	\$7,279.50
Current Fees and Costs Due	\$7,279.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107747

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
Special Conflict Counsel

For Professional Services Rendered
for the period ending May 31, 2022

Date	Initials	Description	Hours	Rate	Amount
B110 Case Administration					
5/2/2022	MGG	Review PRRADA disclosure requirements. Communications with Joyce Delgado regarding same. [B110]	1.00	\$575.00	\$575.00
5/5/2022	MGG	Review Ninth Supplemental Verified Statement of Official Committee of Unsecured Creditors Pursuant to 2019 and compliane with PPRADA. [B110]	0.30	\$575.00	\$172.50
5/9/2022	MGG	Review and consider disclosure requirements and preparation of Disclosure Statement Verified Statement Disclosing Connections Pursuant to PRRADA. [B110]	1.00	\$575.00	\$575.00
5/12/2022	CAS	E-mail correspondence to E. Lugo re: fee examiner confidential letter report on interim fee applications. [B110]	0.30	\$150.00	\$45.00
5/20/2022	CAS	Follow up with F. Rosado re: payment of holdbacks to GJB closed bank account and resolution. [B110]	0.30	\$150.00	\$45.00
B113 Pleadings Review					
5/2/2022	JAD	Emails with M. Guitian re: PRRADA disclosures. [B113]	0.20	\$315.00	\$63.00
5/9/2022	JAD	Review Disclosure Statements to determine PRRADA requirements (.3); correspondence with M. Guitian re: Same (.3). [B113]	0.60	\$315.00	\$189.00
5/13/2022	JAD	Review correspondence re: PRRADA disclosures. [B113]	0.50	\$315.00	\$157.50
B160 Fee/Employment Applications					

Date	Initials	Description	Hours	Rate	Amount
B160 Fee/Employment Applications					
5/4/2022	MGG	Review email from Hacienda re: GJB Fee holdbacks. Communications with Ken Forrest regarding same. [B160]	0.60	\$575.00	\$345.00
5/4/2022	CAS	E-mail correspondence with F. Rosado and K. Forrest re: holdback period and amounts. [B160]	0.40	\$150.00	\$60.00
5/10/2022	MGG	Meeting with Carolyn Scavone re: request from Hacienda regarding payment of GJB's hold-backs for the Thirteenth Interim Period. Review request and adjustments by fee examiner. Communications with accounting regarding same. [B160]	0.90	\$575.00	\$517.50
5/12/2022	MGG	Work with Carolyn Scavone re: Fee Examiner's Confidential Letter Report and payment of hold-backs. [B160]	0.50	\$575.00	\$287.50
5/13/2022	MGG	Review and study PRADA disclosure requirements. Communications with Nicholas Hahn regarding PRADA Disclosures. 0. [B160]	3.50	\$575.00	\$2,012.50
5/16/2022	MGG	Receipt and respond to email from Frank Rosado Mendez : request from Hacienda for payment of holdbacks. Communications with Ken Forrest and Carolyn Scavone regarding same. Review report and breakdown of amounts owed. [B160]	0.50	\$575.00	\$287.50
5/16/2022	CAS	E-mail correspondence with F. Rosado, K. Forrest and M. Guitian re: hold back amounts due by agency. [B160]	0.40	\$150.00	\$60.00
5/19/2022	MGG	Review prebills (.6). Telephone conference with Lillian Rice (.3). [B160]	0.90	\$575.00	\$517.50
B191 General Litigation					
5/2/2022	TGM	Download and categorize e-Discovery received from BNP Paribas (2.11.22 - 05.06.22); prepare for forwarding to J. Arrastia at Continental, PLLC, for processing. [B191]	4.70	\$120.00	\$564.00
5/4/2022	TGM	Download and categorize e-Discovery received today from BNP Paribas; prepare for forwarding to J. Arrastia at Continental, PLLC, for processing. [B191]	0.40	\$120.00	\$48.00
5/5/2022	TGM	Download and categorize e-Discovery received today from BNP Paribas; prepare for forwarding to J. Arrastia at Continental, PLLC, for processing. [B191]	0.90	\$120.00	\$108.00
5/6/2022	TGM	Download and categorize e-Discovery received today from BNP Paribas; prepare for forwarding to J. Arrastia at Continental, PLLC, for processing. [B191]	0.70	\$120.00	\$84.00
5/10/2022	TGM	Download and categorize e-Discovery received today from BNP Paribas; prepare for forwarding to J. Arrastia at Continental, PLLC, for processing. [B191]	0.90	\$120.00	\$108.00

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
5/11/2022	TGM	Download and categorize e-Discovery received today from BNP Paribas; prepare for forwarding to J. Arrastia at Continental, PLLC, for processing. [B191]	0.30	\$120.00	\$36.00
5/12/2022	TGM	Download and categorize e-Discovery received today from BNP Paribas; prepare for forwarding to J. Arrastia at Continental, PLLC, for processing. [B191]	1.20	\$120.00	\$144.00
5/20/2022	TGM	Download and categorize e-Discovery received today from BNP Paribas; prepare for forwarding to J. Arrastia at Continental, PLLC, for processing. [B191]	0.40	\$120.00	\$48.00
5/31/2022	MGG	Conference with Tricia Garcia-Montes re: handling of documents received and termination of service. [B191]	0.40	\$575.00	\$230.00
Total			21.80		\$7,279.50

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
MGG	Mariaelena Gayo-Gutian	Partner	9.60	\$575.00	\$5,520.00
JAD	Joyce A. Delgado	Associate	1.30	\$315.00	\$409.50
TGM	Tricia Garcia-Montes	Paralegal	9.50	\$120.00	\$1,140.00
CAS	Carolyn A. Scavone	Paralegal	1.40	\$150.00	\$210.00
Total			\$21.80		\$7,279.50
Current Fees and Costs					\$7,279.50

TASK RECAP

Services

Category	Hours	Amount	Category	Amount
B110	2.90	\$1,412.50		
B113	1.30	\$409.50		
B160	7.70	\$4,087.50		
B191	9.90	\$1,370.00		
	<u>21.80</u>	<u>\$7,279.50</u>		<u>\$0.00</u>

BREAKDOWN BY PERSON

Person

Person	Category	Hours	Amount	
MGG	Mariaelena Gayo-Guitian	B110	2.30	\$1,322.50
MGG	Mariaelena Gayo-Guitian	B160	6.90	\$3,967.50
MGG	Mariaelena Gayo-Guitian	B191	0.40	\$230.00
JAD	Joyce A. Delgado	B113	1.30	\$409.50
TGM	Tricia Garcia-Montes	B191	9.50	\$1,140.00
CAS	Carolyn A. Scavone	B110	0.60	\$90.00
CAS	Carolyn A. Scavone	B160	0.80	\$120.00
		<u>21.80</u>	<u>\$7,279.50</u>	

100 Southeast Second Street, 44th Floor

Miami, Florida 33131

Telephone: (305) 349-2300 Facsimile: (305) 349-2310

Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107748

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
 Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000001

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors /

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending June 30, 2022	\$14,956.50
Costs incurred and advanced	\$88.40
Current Fees and Costs Due	\$15,044.90

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107748

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
Special Conflict CounselFor Professional Services Rendered
for the period ending June 30, 2022

Date	Initials	Description	Hours	Rate	Amount
B110 Case Administration					
6/6/2022	CAS	Preparation of draft Supplemental Declaration of Mariaelena Gayo-Gutian, Esq. Regarding Retention of Genovese, Joblove & Battista, P.A., as Special Litigation Counsel to Official Committee of Unsecured Creditors. [B110]	0.80	\$150.00	\$120.00
6/6/2022	CAS	Conference with J. Delgado and M. Guitian re: preparation of the Supplemental Declaration of Mariaelena Gayo-Gutian, Esq., Regarding Retention of Genovese, Joblove & Battista, P.A. [B110]	0.50	\$150.00	\$75.00
6/29/2022	CAS	Interoffice meeting with V. Lambdin re: filing Unopposed Motion for Extension of Time to file PRRADA Disclosures; E-mail proposed Order to Judge for issuance. [B110]	0.50	\$150.00	\$75.00
6/29/2022	VLL	File Unopposed Motion by Genovese Joblove & Battista PA for Extension of Deadline Nunc Pro Tunc to File Disclosures in Compliance with the Requirements Under the Puerto Recovery Accuracy in Disclosures Act (PRRADA); telephone conference with C. Scavone and J. Sardina regarding procedure to submit order. [B110]	0.60	\$150.00	\$90.00
B160 Fee/Employment Applications					
6/3/2022	MGG	Review PRRADA Disclosure requirements and orders. Review filings by Paul Hastings and Continental LPPL. [B160]	1.50	\$575.00	\$862.50
6/6/2022	MGG	Continue work on review of PRRADA Disclosure requirements and preparation of supplemental disclosures. [B160]	2.50	\$575.00	\$1,437.50

Date	Initials	Description	Hours	Rate	Amount
B160 Fee/Employment Applications					
6/6/2022	JAD	Confer with M. Guitian and paralegal C. Scavone re: PRRADA disclosures (1.5); revise Disclosure Statement to comply with PRRADA (1.2). [B160]	2.70	\$315.00	\$850.50
6/7/2022	MGG	Review Amended MIP List and confer with Joyce Delgado re: running of new Conflict Check. [B160]	0.60	\$575.00	\$345.00
6/7/2022	MGG	Communications with Carolyn Scavone re: services of invoices for January and February 2022. [B160]	0.50	\$575.00	\$287.50
6/7/2022	JAD	Emails with M. Guitian re: Declaration in Support of PRRADA Disclosures. [B160]	0.30	\$315.00	\$94.50
6/8/2022	JAD	Correspondence with M. Guitian re: Motion for Extension of Time. [B160]	0.40	\$315.00	\$126.00
6/9/2022	JAD	Correspondence with United States Trustee re: Motion for Extension of Time (.4). [B160]	0.40	\$315.00	\$126.00
6/13/2022	JAD	Emails with United States Trustee and M. Guitian re: Motion for Extension of Time (.3). [B160]	0.30	\$315.00	\$94.50
6/14/2022	MGG	Communications with Joyce Delgado re: UST's position on filing a retroactive motion to extend deadline for PRRADA Disclosures. [B160]	0.30	\$575.00	\$172.50
6/14/2022	JAD	Review correspondence with M. Guitian and United States Trustee re: PRRADA Disclosures. [B160]	0.50	\$315.00	\$157.50
6/16/2022	MGG	Follow up with Joyce Delgado re: PRRADA disclosures and conflict check. [B160]	0.50	\$575.00	\$287.50
6/16/2022	JAD	Correspondence re: internal conflict check to ensure compliance with PRRADA disclosure requirements. [B160]	0.40	\$315.00	\$126.00
6/17/2022	JAD	Review correspondence re: PRRADA disclosures and Motion for Extension of Time with M. Guitian. [B160]	0.50	\$315.00	\$157.50
6/17/2022	JAD	Prepare Motion for Extension of Time to file PRRADA Disclosures (1.8); revise Verified Statement of GJB (.9). [B160]	2.70	\$315.00	\$850.50
6/18/2022	MGG	Review and revise Motion for Extension of Time for GJB to file PRRADA Disclosures. [B160]	0.60	\$575.00	\$345.00
6/18/2022	MGG	Review Supplemental PRRADA Declaration. [B160]	0.80	\$575.00	\$460.00
6/18/2022	JAD	Revise Motion for Extension of Time to file PRRADA Disclosures (.4); confer with M. Guitian re: same (.2). [B160]	0.60	\$315.00	\$189.00
6/22/2022	MGG	Review Motion of the United States Trustee For Amendment of the Third Amended Order Setting Procedures for Interim and Final Compensation and Reimbursement of Expenses of Professionals (ECF No. 20546) and proposed order (.3). Communications with Joyce Delgado re: revisions to Supplemental GJB Declaration (.3). [B160]	0.60	\$575.00	\$345.00

Date	Initials	Description	Hours	Rate	Amount
B160 Fee/Employment Applications					
6/22/2022	JAD	Review correspondence with M. Guitian and conflict check staff re: internal conflict check reports to ensure compliance with PRRADA. [B160]	0.40	\$315.00	\$126.00
6/28/2022	MGG	Review Amended MIP List, and 3 conflict check reports and proposed revisions to Declaration. [B160]	3.00	\$575.00	\$1,725.00
6/28/2022	JAD	Review correspondence and Orders re: Motion for Extension of Time. [B160]	0.80	\$315.00	\$252.00
6/29/2022	JAD	Emails with paralegal C. Scavone for filing of Motion for Extension of Time. [B160]	0.60	\$315.00	\$189.00
6/29/2022	CAS	Review January 2022 invoices and preparation of Monthly Fee Letter for January, 2022. [B160]	1.00	\$150.00	\$150.00
6/29/2022	CAS	Preparation of Exhibit B Tax Declaration to the January 2022 Monthly Fee Letter. E-mails with K. Forrest re: same. [B160]	0.50	\$150.00	\$75.00
6/30/2022	MGG	Work on supplemental Verified Statement for GJB to disclose connections to Amended MIP List per PRRADA Disclosure requirements. [B160]	3.50	\$575.00	\$2,012.50
6/30/2022	CAS	Finalize and serve Monthly Fee Letter for January 2022 on Fee Examiner, U.S. Trustee, and Committee of Unsecured Creditors. [B160]	0.50	\$150.00	\$75.00
6/30/2022	CAS	Calendar the objection deadline to the January 2022 Monthly Fee Letter. [B160]	0.20	\$150.00	\$30.00
B170 Fee/Employment Objections					
6/8/2022	MGG	Communications with Nicholas Hahn, Esq re: PRRADA Disclosures and procedures of Fee Examiner on approval of interim fee application. Review procedures. Review February prebills. [B170]	1.50	\$575.00	\$862.50
6/9/2022	MGG	Communications with Allison Day re: PRRADA Disclosures and request for information and documents (1.0). Consider issues with PRRADA disclosures (1.50). [B170]	2.50	\$575.00	\$1,437.50
6/14/2022	MGG	Communications with Jose Francisco Cartaya re: professional fee statement as local counsel. [B170]	0.50	\$575.00	\$287.50
B191 General Litigation					
6/19/2022	TGM	Create spreadsheet with total of possible conflict hits to review re: PROMESA Title III. [B191]	0.50	\$120.00	\$60.00
Total			34.60		\$14,956.50

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
MGG	Mariaelena Gayo-Guitian	Partner	18.90	\$575.00	\$10,867.50

Timekeeper Summary

ID	Timekeeper Name	Title	BillHours	BillRate	BillAmount
JAD	Joyce A. Delgado	Associate	10.60	\$315.00	\$3,339.00
TGM	Tricia Garcia-Montes	Paralegal	0.50	\$120.00	\$60.00
VLL	Vonda L. Lambdin	Paralegal	0.60	\$150.00	\$90.00
CAS	Carolyn A. Scavone	Paralegal	4.00	\$150.00	\$600.00
	Total		\$34.60		\$14,956.50

Costs incurred and advanced

Date	Description	Amount
06/30/2022	PACER Service Center- Online Research- Pacer 2nd qtr 2022 [E100 - E106]	\$88.40
	Total Costs incurred and advanced	\$88.40
	Current Fees and Costs	\$15,044.90

TASK RECAP

Services			Disbursements	
<u>Category</u>	<u>Hours</u>	<u>Amount</u>	<u>Category</u>	<u>Amount</u>
B110	2.40	\$360.00	E100 - E106	\$88.40
B160	27.20	\$11,949.00		
B170	4.50	\$2,587.50		
B191	0.50	\$60.00		
	<u>34.60</u>	<u>\$14,956.50</u>		<u>\$88.40</u>

BREAKDOWN BY PERSON

<u>Person</u>		<u>Category</u>	<u>Hours</u>	<u>Amount</u>
MGG	Mariaelena Gayo-Guitian	B160	14.40	\$8,280.00
MGG	Mariaelena Gayo-Guitian	B170	4.50	\$2,587.50
JAD	Joyce A. Delgado	B160	10.60	\$3,339.00
TGM	Tricia Garcia-Montes	B191	0.50	\$60.00
VLL	Vonda L. Lambdin	B110	0.60	\$90.00
CAS	Carolyn A. Scavone	B110	1.80	\$270.00
CAS	Carolyn A. Scavone	B160	2.20	\$330.00
			<u>34.60</u>	<u>\$14,956.50</u>

100 Southeast Second Street, 44th Floor

Miami, Florida 33131

Telephone: (305) 349-2300 Facsimile: (305) 349-2310

Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107749

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
 Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 012272-000001

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors /

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending July 31, 2022	\$3,017.00
Current Fees and Costs Due	\$3,017.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Remittance Address

Genovese Joblove & Battista, P.A.

Attn.: Accounts Receivable

100 Southeast Second Street, 44th FL

Miami, FL 33131

Wire and ACH/Wire Instructions:Beneficiary Bank: City National Bank of Florida
100 SE 2nd Street

Miami, FL 33131

ABA Routing Number: 066004367

Swift Code (Optional): CNBFUS3M

Account Number: 30000160777

Account Name: Genovese Joblove & Battista, P.A.

For payment, please reference the invoice, client and matter number(s) being paid.

Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

PROMESA - Official Committee of Unsecured Creditors

,

November 15, 2022

Please Refer to

Invoice Number: 107749

GJB Tax I.D. No.: 65-0518134

RE: PROMESA: Official Committee of Unsecured Creditors /
Special Conflict Counsel

For Professional Services Rendered
for the period ending July 31, 2022

Date	Initials	Description	Hours	Rate	Amount
B110 Case Administration					
7/12/2022	CAS	Review Order Denying as Moot, GJB's Motion for Extension of Deadline to file PRRADA disclosures; Calendar. [B110]	0.30	\$150.00	\$45.00
7/14/2022	MGG	Review email from Allison Day re: disclosures. Revise and finalize Verified Statement pursuant to PRRADA requirements. [B110]	1.50	\$575.00	\$862.50
B160 Fee/Employment Applications					
7/1/2022	MGG	Review conflict check reports prepared and review by Paula Lawson. [B160]	1.00	\$575.00	\$575.00
7/8/2022	JAD	Review correspondence re: Verified Statement. [B160]	0.30	\$315.00	\$94.50
7/11/2022	JAD	Review correspondence with M. Guitian re: Verified Statement. [B160]	0.30	\$315.00	\$94.50
7/15/2022	MGG	Finalize and file Verified Statement to comply with PRRADA Disclosures. [B160]	0.50	\$575.00	\$287.50
7/15/2022	JAD	Review filed Verified Statement. [B160]	0.20	\$315.00	\$63.00
B170 Fee/Employment Objections					
7/1/2022	MGG	Email to and from Jessey Sardinia re: Fee Applications filed by GJB. Receipt and review Second and Third Fee Applications filed and disclosure of time entries by Allison Day. Communications with Ms. Day regarding disclosures. [B170]	1.60	\$575.00	\$920.00
B191 General Litigation					

Date	Initials	Description	Hours	Rate	Amount
B191 General Litigation					
7/15/2022	CAS	Finalize and file Verified Statement of Mariaelena Gayo-Guitian Regarding Retention of Genovese, Joblove & Battista, P.A. [B191]	0.50	\$150.00	\$75.00
		Total	6.20		\$3,017.00

Timekeeper Summary

ID	Timekeeper Name	Title	Bill Hours	Bill Rate	Bill Amount
MGG	Mariaelena Gayo-Guitian	Partner	4.60	\$575.00	\$2,645.00
JAD	Joyce A. Delgado	Associate	0.80	\$315.00	\$252.00
CAS	Carolyn A. Scavone	Paralegal	0.80	\$150.00	\$120.00
	Total		\$6.20		\$3,017.00

Current Fees and Costs \$3,017.00

TASK RECAP

Services			Disbursements	
<u>Category</u>	<u>Hours</u>	<u>Amount</u>	<u>Category</u>	<u>Amount</u>
B110	1.80	\$907.50		
B160	2.30	\$1,114.50		
B170	1.60	\$920.00		
B191	0.50	\$75.00		
	<u>6.20</u>	<u>\$3,017.00</u>		<u>\$0.00</u>

BREAKDOWN BY PERSON

<u>Person</u>		<u>Category</u>	<u>Hours</u>	<u>Amount</u>
MGG	Mariaelena Gayo-Guitian	B110	1.50	\$862.50
MGG	Mariaelena Gayo-Guitian	B160	1.50	\$862.50
MGG	Mariaelena Gayo-Guitian	B170	1.60	\$920.00
JAD	Joyce A. Delgado	B160	0.80	\$252.00
CAS	Carolyn A. Scavone	B110	0.30	\$45.00
CAS	Carolyn A. Scavone	B191	0.50	\$75.00
			<u>6.20</u>	<u>\$3,017.00</u>

SCHEDULE 3

PROPOSED ORDER

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

Debtors.¹

/

**ORDER GRANTING NINTH & FINAL INTERIM FEE APPLICATION OF GENOVESE
JOBLOVE & BATTISTA, P.A. AS SPECIAL LITIGATION COUNSEL TO
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES
FOR PERIOD FROM JANUARY 1, 2022 – JULY 31, 2022**

Upon consideration of the Ninth & Final Fee Application (the “Application”)² of Genovese Joblove & Battista, P.A. (“GJB”), as special litigation counsel to the Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee”)³, for an order pursuant to sections 316 and 317 of PROMESA, section 503(b) of the Bankruptcy Code made applicable to these cases by section 301(a) of PROMESA, Bankruptcy Rule 2016, and Local Rule 2016-1, for allowance of

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

³ The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

compensation and reimbursement of expenses for the period from January 1, 2022 through July 31, 2022, the Court hereby FINDS AND DETERMINES that (i) the Court has jurisdiction to consider the Application and the relief requested therein pursuant to section 306(a) of PROMESA; (ii) venue is proper before this Court pursuant to section 307(a) of PROMESA; (iii) due and proper notice of the Application has been provided under the particular circumstances and no other or further notice need be provided; (iv) any objections to the Application having been resolved; (v) all persons with standing having been afforded the opportunity to be heard on the Application; and after due deliberation and sufficient cause appearing therefor, it is hereby **ORDERED THAT:**

1. The Application is granted on a final basis.
2. GJB's claim for fees and expenses for services rendered during the Application Period and reimbursement for actual and necessary expenses incurred during the Application Period are hereby allowed in the amounts of \$117,740.40 and \$11,922.93 respectively.
3. To the extent the amounts described in paragraph 2 hereof have not already been paid pursuant to the Interim Compensation Order, (a) the Debtors are directed to pay GJB the outstanding fees in the amount of \$117,740.40 which represents 100% of the fees requested within fourteen days of the date of this Order, and any such payment shall be made net of any payments made by the Debtors pursuant to the Interim Compensation Order, withholding or other applicable taxes, and (b) the Debtors are directed to reimburse GJB for its outstanding expenses in the amount of \$11,922.93, which represents 100% of the expenses requested within fourteen days of the date of this Order.
4. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

5. GJB is authorized and empowered to take all necessary actions to implement the relief granted in this Order.

6. Notwithstanding the possible applicability of Bankruptcy Rules 6006(d), 7062, 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

Dated: _____, 2022.

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE